

# Exhibit E

Sworn Statement of Sarah Dorismar



**In The Matter Of:**

*In Re: Investigation of Ideal Horizon Benefits,  
d/b/a Solar Titan USA, Inc.*

---

*Sworn Statement of Sarah Dorismar  
August 27, 2022*

---

*Christina A. Meza, LCR, RPR, CCR  
Licensed Court Reporter*

Original File 2022-08-27 Sarah Dorismar.txt  
**Min-U-Script® with Word Index**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

1

IN RE: )  
 )  
INVESTIGATION OF IDEAL HORIZON )  
BENEFITS, d/b/a SOLAR TITAN )  
USA, INC. )

-----  
**SWORN STATEMENT OF**

**SARAH DORISMAR**

**Saturday, August 27, 2022**  
-----

**APPEARANCES:**

**For the State of Tennessee Attorney General's Office:**

Mr. Samuel D, Keen  
Ms. Alicia Daniels-Hill  
Ms. Emily Knight  
Consumer Protection Division  
Office of the Tennessee Attorney General  
P.O. Box 20207  
Nashville, TN 37202  
615-837-5155  
samuel.keen@ag.tn.gov  
alicia.daniels-hill@ag.tn.gov

**Transcribed By:**  
**Christina A. Meza, LCR, RPR, CCR**

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

2

1                   The sworn statement of Sarah Dorismar  
2 was taken by counsel for the Office of the Tennessee  
3 Attorney General by Zoom video conference on Saturday,  
4 August 27, 2022, for all purposes allowed under the  
5 Tennessee Rules of Civil Procedure.

6                   The reading and signing of the  
7 completed sworn statement by the witness was not  
8 discussed.

9 -----

10	INDEX	
11		PAGE
11	SARAH DORISMAR:	
12	Examination by Ms. Daniels-Hill .....	4

13  
14                   EXHIBITS  
15                   (NONE OFFERED.)

16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

3

1 MS. DANIELS-HILL: We are on the  
2 record in the matter of in re Investigation of Ideal  
3 Horizon Benefits doing business as Solar Titan USA  
4 pursuant to a request for information issued  
5 to Sarah -- and I'm going to say your name as Dorismar;  
6 is that right?

7 THE WITNESS: Yes.

8 MS. DANIELS-HILL: -- issued on  
9 August 22nd, 2022. Good morning, Ms. Dorismar. Would  
10 you state your name for the record.

11 THE WITNESS: Sarah Dorismar.

12 MS. DANIELS-HILL: Will you spell your  
13 last name?

14 THE WITNESS: It's D-O-R-I-S-M-A-R.

15 MS. DANIELS-HILL: Thank you. My name  
16 is Alicia Daniels-Hill. I'm a legal assistant with the  
17 Tennessee Attorney General's office, and I have with me  
18 on the line Samuel Keen, assistant attorney general at  
19 the Tennessee Attorney General's office; and Emily  
20 Knight. She is the administrative secretary for our  
21 office and a registered notary in the state of  
22 Tennessee. Do you have any objections to Ms. Knight  
23 swearing you in?

24 THE WITNESS: No.

25 MS. DANIELS-HILL: Thank you.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

4

1 Ms. Knight, will you swear her in.

2 MS. KNIGHT: Absolutely. Good

3 morning, Ms. Dorismar.

4 MS. DORISMAR: Good morning.

5 (Oath administered by

6 Ms. Emily Knight.)

7 SARAH DORISMAR,

8 called as a witness, having been duly sworn, was

9 examined and testified as follows:

10 EXAMINATION

11 BY MS. DANIELS-HILL:

12 Q. And, Ms. Dorismar, we talked about this

13 earlier, that Ms. Knight will not be staying as a

14 part of the Zoom call -- for the entirety of the

15 Zoom call, but you understand that you will remain

16 under oath for the remainder of this call?

17 A. Yes.

18 Q. Okay. Ms. Dorismar, do you understand

19 what being under oath means?

20 A. Yes.

21 Q. So you understand that you're providing

22 this testimony under penalty of perjury?

23 A. Uh-huh. (Witness moves head up and

24 down.)

25 Q. And also your responses to this

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

5

1 recording may need to be transcribed by a court  
2 reporter later.

3 A. Okay.

4 Q. For that reason, we'll make sure that  
5 you're only going to be giving verbal responses.  
6 You can nod your head, but also please say yes or  
7 no, for example. Is that something that you can do  
8 today?

9 A. Yes.

10 Q. And then I'll do my best to pause after  
11 you've responded to make sure we're not talking over  
12 one another on the recording.

13 A. Sorry. Sorry. You saw my son getting  
14 in the car.

15 Q. No problem. But do you -- would you be  
16 able to also make a pause after someone has asked a  
17 question just to make sure that when we --

18 A. Yeah.

19 Q. -- throughout the recording that --  
20 we're not talking over each other on accident?

21 A. Yeah.

22 Q. So I imagine we'll probably take a few  
23 breaks today, depending on how long this proceeding  
24 goes. If you need a break, do you mind letting me  
25 know?

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

6

1       A.               Yes. That will be good. Uh-huh. Do  
2       you know how long it's going to be, just because it  
3       is a Saturday, and -- I mean, I don't know how much  
4       information I would be able to share that is  
5       beneficial, but ...

6       Q.               So I was going to say it's hard to tell  
7       how long this will go because it's really going to  
8       depend on how long it takes us to get the  
9       information that we were hoping to get from the  
10      sworn statement, but what I will say is we will not  
11      be delaying or trying to take up most of your  
12      Saturday. If the information comes out quickly,  
13      then we'll end as soon as we've gotten the  
14      information.

15     A.               Okay.

16     Q.               If there are any questions that I ask  
17     that you don't understand, will you let me know so I  
18     can clarify?

19     A.               Yes.

20     Q.               The same with Mr. Keen. He may also  
21     have questions. Will you ask him to clarify if  
22     there's a question that he asks that you don't  
23     understand?

24     A.               Yeah.

25     Q.               And then finally I just wanted to kind

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

7

1 of go over what a sworn -- what giving a sworn  
2 statement is for the purposes of a request for

3 information, because they are a little bit different  
4 than civil court proceedings and civil depositions.  
5 This is a tool that our office has and allows us to  
6 get information to determine whether there's a  
7 violation of the Consumer Protection Code.

8 A. Uh-huh.

9 Q. And that means that with that comes  
10 certain authority. Generally for all the questions  
11 that we ask, as long as it relates to what we're  
12 investigating, this would be something that you  
13 would not be allowed to withhold information for  
14 unless you have attorney-client privilege.

15 To my knowledge, you had not told us if you  
16 had been represented by counsel. Are you currently  
17 represented by counsel?

18 A. No.

19 Q. So if you had, then I just wouldn't ask  
20 questions about your conversations with your  
21 attorney because that would be privileged.

22 So that now that we've gotten past some of  
23 the ground rules, let's talk a little bit about your  
24 background.

25 A. Uh-huh.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

8

1 Q. These are questions that we typically  
2 ask for every sworn statement. Have you ever  
3 testified in a trial or a deposition before?

4 A. No.

5 Q. And will you tell me --

6 A. Oh, actually -- sorry -- yes. Several  
7 years ago I did testify on a custody hearing.

8 Q. Do you remember who the parties were in  
9 that custody hearing?

10 A. The father was Michael Brewer.

11 Q. Were you the other party?

12 A. No. I was a witness to -- they were  
13 moving their children to Haiti. They were moving  
14 their children to Haiti, and because I had lived  
15 there for several years, they just wanted me to give  
16 testimony on what it was like to have family there.

17 Q. You said that was a couple of years ago.  
18 So in 2020 or --

19 A. No. Like 2011-ish maybe. I can't  
20 remember exactly the dates.

21 Q. And who was the mother in that case?

22 A. I actually can't remember her name.

23 Q. Do you remember what court you were  
24 testifying in?

25 A. In Blunt County.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

9

1 Q. In what state?

2 A. Tennessee.

3 Q. Just in case there's more than one of  
4 those, I just wanted to clarify. Have you actually  
5 resided in any other states than Tennessee?

6 A. No, other than when I lived in Haiti,  
7 but that's not another state.

8 Q. How long did you live in Haiti?

9 A. Four years.

10 Q. Do you remember what years those were?

11 A. I moved in 2010 and then back in 2014.

12 Q. And where are you currently residing?

13 A. In Townsend, Tennessee.

14 Q. And what do you currently do?

15 A. I am working at BlackBerry Farm in the  
16 registration -- not registration -- the reservation  
17 department.

18 Q. How long have you been working for  
19 BlackBerry Farm?

20 A. Since June 24th.

21 Q. What were you doing before June 24th?

22 A. I was with Solar Titan.

23 Q. And what was your position at Solar  
24 Titan?

25 A. My last position was finance and admin

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

10

1 manager.

2 Q. You said the last position. What was  
3 your position before that?

4 A. I was hired in as just a regular admin  
5 for the operations team, and then after several  
6 months, I was promoted to the last position that I  
7 had.

8 Q. So you were the finance and admin  
9 manager from what time period?

10 A. I do believe it was December of last  
11 year until when I left in I believe it was June.

12 Q. Do you remember what your last day was  
13 with Solar Titan?

14 A. I started at BlackBerry June 24th. So  
15 it was possibly a few days before then because I  
16 pretty much did my two-week notice and then started  
17 at BlackBerry.

18 Q. And how did you find out about the admin  
19 position at Solar Titan when you started?

20 A. I'm sorry. Can you repeat the question.

21 Q. How did you find out about the admin  
22 position at Solar Titan when you started?

23 A. So a friend of mine that was working  
24 there posted on Facebook that they were hiring, and  
25 I just contacted and applied.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

11

1 Q. Who was the friend that posted?

2 A. His name was Russell Williams.

3 Q. Was he currently working at Solar Titan?

4 A. Yes.

5 Q. What was your start date with Solar  
6 Titan?

7 A. September 28th. So this year would have  
8 been two years. So I believe that would be 2020.

9 Q. And did you have to apply for the  
10 position?

11 A. Yes. I came in for -- I don't believe  
12 there was a formal application at the time just  
13 because they were starting up, but I did come in --  
14 I sent in my resume and then I came in for an  
15 interview and was hired at the interview.

16 Q. Do you recall who interviewed you?

17 A. Sarah Kirkland.

18 Q. Was there anyone else in that interview  
19 or --

20 A. No.

21 Q. -- just you and Ms. Kirkland?

22 A. Uh-huh.

23 Q. And how long after the interview was the  
24 process for actually getting on board?

25 A. So I was hired then, and I had -- I

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

12

1 think it was -- I think it was like a Tuesday maybe.  
2 I'm not really sure. It's been two years. But the  
3 next week I do believe is when I started, and then I  
4 had already planned a vacation with my family, so I  
5 worked a week and then took a vacation and then came  
6 back. So it could have been two weeks really.

7 Q. Do you remember what your first week was  
8 like? Were you in training for that whole week or  
9 anything like that?

10 A. Yeah. I went -- I pretty much followed  
11 the two other admins that were currently working  
12 just to kind of get more knowledge of the business  
13 and, like, their processes and stuff. But what they  
14 actually hired me to do was something that they --  
15 the two that had already been there -- they've never  
16 handled the finances. So when I started, Sarah and  
17 Craig, who are owners -- they handled working with  
18 the finance companies and different things like  
19 that.

20 So because they were growing, they hired me  
21 to kind of take those roles on from them. So there  
22 wasn't technically a finance department. So there  
23 wasn't any policies and procedures and things like  
24 that. So they allowed me to create that -- those  
25 policies and things, and as we grew, that department

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

13

1 grew. All the departments grew really.

2 Q. So you said Sarah and who else was

3 handling the finances?

4 A. Craig Kelley.

5 Q. And did you do any training under them  
6 since they were the ones that were handling it?

7 A. With Sarah, yes.

8 Q. And then what exactly did Craig Kelley  
9 do?

10 A. So I didn't really have a lot of  
11 training with Craig. I'm not a hundred percent sure  
12 what he did, but I do know that if things weren't  
13 done fast enough, I would be getting phone calls.

14 Q. So how did you know that Craig had also  
15 been handling the financing with the finance  
16 companies?

17 A. Sarah just told me. So, like, she  
18 handled a portion and then he handled -- so there's  
19 pre -- pre-installation processes with the financing  
20 companies and then there's post installation process  
21 for the finance companies. So I don't know how they  
22 split it up. I just know that they both worked on  
23 those processes. And then when I came along, they  
24 taught me both of those processes and that took it  
25 off of their plates.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

14

1 Q. I forgot to ask you this earlier. You  
2 said you initially followed two other admin staff.  
3 What were their names?

4 A. So Russell Williams and then Lakea  
5 Helton.

6 Q. You said they were doing different work  
7 than you would be doing?

8 A. Right.

9 Q. So when you were working on the -- I  
10 guess the finance -- or working with the finance  
11 companies, did you use any specific systems for  
12 that?

13 A. So each one of the finance companies had  
14 their own portal and required documentation that we  
15 had to submit to them. So we just -- that's what we  
16 worked with.

17 Q. You learned the portals for the  
18 different financing companies?

19 A. Uh-huh, yeah.

20 Q. Who was it that taught you that -- was  
21 that Sarah Kirkland as well?

22 A. Yeah.

23 MS. DANIELS-HILL: Before I get too  
24 much further in, I want to stop and make sure that  
25 Mr. Keen doesn't have any questions.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

15

1 (No audible response.)

2 BY MS. DANIELS-HILL:

3 Q. Would you kind of go over some of your  
4 job responsibilities when you first started?

5 A. Yeah. So as I was stating, there were  
6 pre-installation requirements. So at the time we  
7 were working with Mosaic and Sunlight were the two  
8 financing companies, and then obviously there were  
9 cash buyers that we required 50 percent down and  
10 then 50 percent at installation.

11 So Mosaic required that we submitted the  
12 installation agreement that showed what size system  
13 that they bought and different things like that. So we  
14 submitted that document, and then they reviewed it and  
15 the other -- also with the actual loan documents that  
16 the customers signed at the time of the purchase just  
17 to make sure that everything matched. And then once  
18 they finished reviewing it, they moved forward and we  
19 had to put in the bill of lading information, so the  
20 cost of the materials. And then once all of that was  
21 reviewed and accepted, then Mosaic gave us the clear to  
22 move forward with installation.

23 And the same thing with Sunlight. They had  
24 different requirements of documents that they -- pretty  
25 much the same thing. So once all of their processes

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

16

1     were approved, we were clear to move forward.

2                     And then that's when I gave the file to  
3     either Russell or Lakea, depending on the state that  
4     the client was in, and they would work with the utility  
5     companies and the permitting authorities for those  
6     states to get all the required things processed there.

7                     And then because -- I don't know -- because  
8     I was good at multitasking, they also gave me the  
9     responsibilities for scheduling the crews. So at the  
10    time I think we only had three crews, so it wasn't that  
11    difficult to -- once finance was cleared and it went  
12    through permitting and it came back to me for  
13    scheduling for installation, then I scheduled the crews  
14    to go out and called the customers to verify the dates  
15    that we had available for us to come out and schedule  
16    and install the system.

17                    And then once everything was finished, then  
18    I would -- it would still be with me because financing  
19    companies had the requirements for post installation.  
20    So they had to -- we had to submit the engineering  
21    plans and also pictures of the install to show the  
22    finance companies that we completed the project. And  
23    then that was the second milestone.

24                    And once that was complete, it went back to  
25    the permitting department to where they pulled --

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

17

1 they -- from where they pulled the permits, they  
2 contacted the inspectors for that area and let them

3 know that we finished the project and for it to get  
4 inspected. So there was a certain amount of time that  
5 we had to get the inspection done and then uploaded the  
6 passed inspection to the finance company for the last  
7 milestone and then the project would be completed.

8 Q. All right. So that's quite a lot. So  
9 I'm --

10 A. Sorry.

11 Q. It's a little bit more detail in each  
12 part, but I didn't want to interrupt you because  
13 it's actually helpful to see the entire order of how  
14 things are typically done at Solar Titan. So you  
15 said that for pre-installation you would upload the  
16 install agreement from the customer? The customer  
17 signed?

18 A. Right. So when the sales rep goes out,  
19 they have the documentation that we need as the  
20 company and also the documentation for the finance  
21 companies. So while they're there, the finance  
22 companies emailed them the loan documents that they  
23 signed through their email, and then we have the  
24 installation agreement which is our contract with  
25 them that they sign.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

1                   So the sales rep would upload all of the  
2 required documents into our portal, and then I would  
3 take it from that and upload it into the finance  
4 portal.

5   Q.               And how would you get the install  
6 agreement from the customer if the sales rep is  
7 collecting it probably at the time of sale? How are  
8 they providing that information to the office?

9   A.               So they would download all of the  
10 documents. So they would scan them in or take a  
11 pictures of the documents and upload it into our  
12 system, and then once a week, sometimes once every  
13 two weeks, they would bring in the hard copies of  
14 all the documents and we would file it away in the  
15 customer's file.

16   Q.               And so then you would have the access to  
17 upload it on the portal for Mosaic or Sunlight?

18   A.               Yes.

19   Q.               And then how long after the sales rep is  
20 making the sale is that information being uploaded  
21 on the portal for either Mosaic or Sunlight?

22   A.               Usually the next morning. So every  
23 morning we come in and we upload the information of  
24 all the sales that happened the day before.

25   Q.               Okay. So what happens after the upload?

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

19

1 You said that Mosaic reviewed the documents and the  
2 loan documents. When does Solar -- or Mosaic or  
3 Sunlight actually pay Solar Titan?

4 A. So there is -- when I first started, it  
5 was three different amounts and three different  
6 payments at each milestone. So there was a  
7 percentage at the first, at the second milestone,  
8 and the last. I think it was like 10 or 15 percent  
9 at the third milestone.

10 But as they grew and they got more business  
11 and in turn got the finance companies more business,  
12 they changed it to a two-payment time, and I believe --  
13 I can't -- I don't know -- they didn't always share how  
14 much the percent of when each payment happened, but I  
15 believe it was -- when I was leaving, it was either  
16 60/40 or 70/30.

17 So at the first milestone, we received  
18 60 percent of the amount, and then when we uploaded the  
19 installation, we received the last 40. But then if we  
20 didn't reach the third milestone in the time frame that  
21 they gave, they retracted a hundred percent of the  
22 funds until we uploaded that passed inspection.

23 Q. I was going to say, so when you -- or  
24 when Solar Titan had the three milestones, what was  
25 the first, the second, and the third milestone?

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

20

1 A. Like the percentage of how much money  
2 they gave?

3 Q. No. Like what was required for them to  
4 actually pay out?

5 A. So the first -- the first milestone --  
6 it's called bill of lading approved. So it's when  
7 they reviewed and accepted all of the documentation  
8 and they -- Mosaic actually does a welcome call that  
9 they reach out to the customer and just say, hey, we  
10 were notified you are wanting to do this. This is  
11 your loan agreement. This is your interest, like  
12 all of the financial things. And they agree to it,  
13 and so it gets to bill of lading approved and they  
14 let us know that we can move forward. That's  
15 milestone one.

16 Milestone two is when we upload the  
17 pictures of installation and tell them that  
18 installation was completed. That's milestone two. And  
19 then milestone three, which is the last one -- and it's  
20 called -- oh, goodness -- PTO, which it's permission to  
21 operate is when we upload the passed final inspection,  
22 and that's the three different milestones for both  
23 Mosaic and Sunlight.

24 Q. So for the first one, you said it was  
25 the bill of lading?

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

21

1       A.               Uh-huh. So that's because they request  
2       the -- so they request the contract between us and  
3       the customer, and then the amount for the actual  
4       system. So they have to approve that amount. I  
5       don't -- sometimes they would even kick it back if  
6       it was saying it was too much -- I don't know if it  
7       was too much or if something wasn't put in the  
8       system correctly, like if there was a battery or no  
9       battery. So everything just had to be completely  
10      correct before they would approve it.

11     Q.               And the second one is after the install,  
12     but then you have a third one that sounds like it  
13     was after the system was turned on. So when the  
14     system was installed, it wasn't necessarily  
15     operational at the time of install?

16     A.               Correct. Because you have to get a  
17     passed inspection from the state to be able to turn  
18     it on.

19     Q.               And so then that third milestone was  
20     after it was actually turned on?

21     A.               Yes.

22     Q.               Do you remember when they switched from  
23     three milestones to two milestones?

24     A.               They still have three milestones. It's  
25     just the payments switched to where they used to

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

22

1 hold the last 10 percent until we uploaded the third  
2 milestone, and then -- but they are still required  
3 to hit all three milestones.

4 So where before I think they wouldn't have  
5 released that last amount of money until it happens,  
6 and now that they have received all of the money at the  
7 first two, if -- I believe it's 120 days they have from  
8 milestone two to reach milestone three, and if they  
9 don't reach it within 120 days they retract a hundred  
10 percent of the funds until the third milestone was  
11 reached. And that happened quite often.

12 Q. So when did Mosaic decide to switch and  
13 stop holding the 10 percent until the third  
14 milestone is complete?

15 A. I wasn't given that information, so I  
16 don't know exactly when that happened.

17 Q. How did you know that it changed then?

18 A. It was in conversation I believe, but  
19 they didn't tell me, like, the exact time that it  
20 happened. So when I did find out that that changed,  
21 I don't know how long it had been. So, like, the  
22 finances and things like when money was coming in  
23 and out was never something that was shared with  
24 people in the company.

25 Q. Do you remember when you actually found

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

23

1 out, like when someone told you that they --

2 A. No.

3 Q. -- were changing it? Okay. Do you know  
4 the reason that it may have been changed?

5 A. Just because of bringing in more  
6 customers for them, and they're making more money  
7 because we're making more money and that's just one  
8 of their perks, I guess.

9 Q. And I want to make sure that I don't  
10 miss anything. So when they were holding the  
11 10 percent, the first milestone would have paid how  
12 much percentage of the contract?

13 A. Again, they didn't share that  
14 information.

15 Q. So you don't know if it was maybe the  
16 same 60/40 or like a variation of 60/40 or 70/40?

17 A. I can imagine so that it was probably  
18 70/20 and then 10 and some variation of that.

19 Q. I'm looking through to make sure I  
20 didn't miss anything there. So it sounds like you  
21 didn't have access to the accounts or know about the  
22 accounts that the finance companies were paying  
23 their financing into?

24 A. At the beginning no, but towards the end  
25 I did see -- because when there was a lot of what

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

24

1 they called clawbacks was when we didn't reach the  
2 milestone. They would claw back a hundred percent  
3 of the money. So when there was a million dollars  
4 or \$4 million taken out of the bank account, they  
5 came to me a lot and were like -- well, Craig came  
6 to me a lot and was upset that that much money was  
7 taken out. And I just had to reaffirm to him that,  
8 yes, I am the finance manager and, yes, it is my job  
9 to put in the passed inspections to where we don't  
10 have these clawbacks, but I was not the manager over  
11 the permitting department to where they actually  
12 pulled the permits, called for an inspection and got  
13 the inspections, and then I was not over the crews  
14 that actually installed the systems correctly --  
15 that they would get passed inspections the first  
16 time and not have to go out four or five times.

17 So, like, if you want to be upset with  
18 someone, go to those managers. So, like, if I had a  
19 passed inspection, I'm going to be uploading it into  
20 the portal, but I can't upload something that I don't  
21 have. So ...

22 Q. Just to be sure that we're being clear,  
23 when you're talking about the term "clawbacks,"  
24 you're talking about when essentially the finance  
25 company, either Mosaic or Sunlight, passed that 120

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

25

1 day hits, they take the money back out of Solar  
2 Titan's account?

3 A. Yes. So I don't think anybody would  
4 like \$4 million taken out of their account no matter  
5 how much was in it.

6 Q. So this was happening with multiple  
7 contracts if they're taking that much out?

8 A. Yes.

9 Q. Do you know how many contracts that was  
10 happening with at a time?

11 A. At least -- monthly there was money  
12 taken out of the accounts. So -- and that kind of  
13 opens another door to the different types of  
14 clawbacks. So -- and cancellations. So -- and it's  
15 something that I fought for from the day that I  
16 understood the process and knew what was happening  
17 with -- in regards to the finances with not only our  
18 customers, but customers that signed up and then  
19 ended up wanting to cancel later on down the  
20 process. So we have a three-day grace period. You  
21 sign the contract and then you have three days to  
22 cancel that we would let you out of the contract.

23 And that's the same thing with the finance  
24 company. They gave you the three-day grace period  
25 before -- and then there wouldn't be any penalty or

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

26

1 anything to be let out of the contract.

2 But because they wanted us to put the  
3 information into the system the day after the contract  
4 was signed, we met the bill of lading approved most of  
5 the time before that three days was over. So we  
6 received money on that account. But, say we received  
7 the money on day two, day three you call in and want to  
8 cancel, we're legally obligated for you -- to let you  
9 out of the contract, but because we had already reached  
10 that first milestone and they paid us money, their  
11 cancellation process takes longer.

12 So sometimes they will actually get billed  
13 for their first payment before their contract is  
14 finished. Yes, Mosaic is wonderful about anything  
15 coming out of their account is reimbursed to them, but  
16 we had to deal with a lot of customers that were mad  
17 that they had bills coming out and they didn't even  
18 purchase the system. So we just had to explain to them  
19 that that was Mosaic's process and it did take quite a  
20 long time.

21 So I tried to have them hold us three days  
22 from putting in any documentation into the portals so  
23 if anyone canceled within those three days, then we  
24 wouldn't have received money and it wouldn't have taken  
25 longer for the cancellation process to happen. And as

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

27

1 I said, September would have been two years, and I  
2 don't think they do that still.

3 So it's -- they always said it was a cash  
4 flow issue, it was a cash flow issue, but I tried to  
5 explain to them after we get past that first initial  
6 three days, then the cash flow is going to be coming in  
7 every single day. So it's like we can -- on the  
8 grander scheme of things we can take those three days  
9 of not receiving money in for new sales because there's  
10 still going to be money coming in for completed deals,  
11 but just bite the bullet and hold those three days to  
12 where, one, if someone cancels, it's not a strenuous  
13 process.

14 Two, we're not getting -- because there was  
15 one time that Craig got really upset. He said there  
16 was a million dollars in cancellations taken out of our  
17 account and he didn't believe that there was actually a  
18 million dollars worth of customers that wanted to  
19 cancel within the month. And I was like, but there  
20 was, because I had been told and I told my team this is  
21 the process of if they're outside of their three days,  
22 we don't cancel, and they were aware of that. We were  
23 told they were aware of that at purchase.

24 So I told him -- I said if they were within  
25 their three days we canceled. If they called in

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

28

1 outside of their three days, we tried to save the  
2 contract, save the deal, but there was a process of  
3 what they would have to do to cancel outside of that  
4 three days.

5 So I said there would never be money coming  
6 into our accounts if we just held the three days to --  
7 where you wouldn't see this big number of amount coming  
8 out of the account if these customers were canceling  
9 within their legal time frame. So you see a million  
10 dollars coming out of the account, but they're legally  
11 able to cancel. So I'm sorry. You know, I don't know  
12 what else to say other than we shouldn't be receiving  
13 any money until after the three days to begin with, but  
14 that was always a losing battle.

15 So -- and it even turned out to where he --  
16 because it was so much, he didn't believe that either,  
17 one, that they were truly within their three days or,  
18 two, the sales manager was actually reaching out to  
19 them to try to save them. So the process was they  
20 called in, they wanted to cancel, we notified sales,  
21 and they were supposed to reach out to them and try to  
22 save the deal.

23 And if they were able to save the deal,  
24 we -- you know, we might have given them another  
25 kilowatt. We might have updated their battery at no

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

29

1 charge. We might have paid for two payments, whatever  
2 it might have been to try to save the deal. That would

3 have been on a form that was sent back to us that we  
4 just updated their account. Right?

5 If they weren't able to save it and they  
6 were within their three days, they would said us a form  
7 back that says that they tried to offer this, the  
8 customer didn't accept it, cancel out the loan, if they  
9 were within their three days.

10 Well, the sales manager was extremely busy  
11 all the time, out in the field doing trainings, this,  
12 that, and whatever, and just didn't have the time --  
13 because of all the requirements that Craig had on her  
14 wasn't able to get to these customers as quickly as we  
15 needed and as quickly as they were wanting to happen,  
16 but they -- and I even asked, "Can someone else do  
17 these calls?" "No. Shawna is the only one that's  
18 allowed to do these calls because she can handle them."

19 Then it's like 45 calls deep and then  
20 they're way past their three days but we haven't  
21 received the form to cancel it, so they still have a  
22 active loan through Mosaic.

23 And I would bring this to their attention  
24 over and over again that they're legally within their  
25 three days, but we haven't canceled them because we

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

30

1 haven't got the form from sales back. Well -- and then  
2 it turned into -- and then I finally just said, "If I  
3 don't get the forms back, I'm canceling them," because  
4 I wouldn't want an open loan on something that I wasn't  
5 moving forward with when I was legally within my rights  
6 to cancel.

7 And then happened the million dollar  
8 clawback, and Craig was very upset and didn't believe  
9 that we had that many. So he said that moving forward  
10 we get the cancellation. We give it to sales. Once we  
11 get it back -- we get it from sales, we give it to him  
12 for him to give the final approval. And most of the  
13 time it sat on his desk for weeks, and we never even  
14 received a final approval.

15 And then -- so I went to Sarah K. about it  
16 because she's more reasonable, and she said, "Well,  
17 whether or not you get it back from him, do at least  
18 four a week. Do the process for the cancellation at  
19 least four a week from his list." I'm like, Okay.

20 And then I told her. I said, We are  
21 getting -- because we were penalized if we canceled the  
22 loan out after the third day. It was like \$500  
23 cancellation penalty on us. So I'm like we're not  
24 getting any money for these accounts. So if you would  
25 just let me, one, hold the documents to be uploaded to

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

31

1 where we're not even worrying about so-called cash  
2 flow, there wouldn't be cash flow to worry about

3 because we never received anything. That would solve  
4 all of our problems, but obviously you-all aren't  
5 wanting to do that. But if they cancel within their  
6 three days, whether or not Shawna or anyone else that  
7 you're giving authority to call these customers calls  
8 them or not, let me cancel them, because if I cancel  
9 them within the third day we're not getting penalized  
10 the \$500.

11 And then fast-forward to us now having 90  
12 cancellations in queue for Shawna to call and/or Craig  
13 to approve. They are past their three days. There's  
14 still an active loan because we haven't been given  
15 authority to cancel them out, and it's just like I'm  
16 just doing what I'm told. I was canceling them out,  
17 and then I was told not to do any more because he  
18 didn't believe that a million dollars' worth of  
19 cancellation actually happened. So -- all right.  
20 You're the boss. You're the owner. I'm going to do  
21 what you told me to do. Right?

22 So we're 90 deep, and she's telling me to  
23 cancel out three a week. Well, because I had now been  
24 given access to when things come in and when things  
25 come out because of all the different types of

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

32

1 clawbacks, whether it be cancellations or not meeting  
2 the 120 days, I was noticing that when we canceled, not  
3 only were we charged the \$500 fee, but we were being  
4 charged interest for every month that the loan was open  
5 and then canceled. So if it was four or five months  
6 later after they canceled and we actually got around to  
7 canceling it, we were charged four or five months of  
8 interest, plus the cancellation fee.

9 So I went to Sarah K. again. I was like  
10 that is an extreme amount of money that we're as a  
11 company being charged when they're not bringing us --  
12 those are all just money being thrown away. I don't  
13 understand why you-all are okay with just throwing this  
14 much money away when it's this many customers. Like,  
15 it would be one thing if it was one or two a month, but  
16 it's not. It's like three to four a week that are  
17 canceling. So add that up and the volume that they  
18 were selling, that's a lot of money.

19 And she said, "I understand." She said,  
20 "But we just need to do four a week until we can get  
21 this done." I told her -- I said with 90 -- I divided  
22 it up, and I think it was like 10 months. I said,  
23 "Just with the 90 that we have -- if I only did four a  
24 week, it is going to take us 10 months to clear up this  
25 list, and that's a lot of cancellation fees and that's

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

33

1 a lot of interest fees." I said, "That's just the list  
2 of what I have now, not including all of the customers  
3 from today forward that are going to be canceling. So  
4 I don't know when we're ever going to get this cleared  
5 up because of this so-called cash flow issue."

6 And I was like I don't understand why the  
7 company is looking at money that's come in from  
8 potential -- from canceled customers as cash to use.  
9 It's not cash to use. None of it is. Because in all  
10 reality, if you look to -- if the finance company can  
11 claw back at milestone three -- if we haven't uploaded  
12 the last document for milestone three, Mosaic had the  
13 right to claw back a hundred percent of the funds. So,  
14 in my mind, it isn't cash flow until I've uploaded that  
15 passed final, but I wasn't the accountant. I wasn't  
16 over the bank accounts.

17 So then she changed it to eight. She said  
18 I could change it to eight. But she agreed with me  
19 that she didn't handle her personal finances that way,  
20 that she felt the same way that I felt, but Craig I'm  
21 assuming is a bigger owner in the company and he made  
22 the decision to where we only did -- did it the way  
23 that he wanted.

24 So it wasn't until after I left that Sarah  
25 called me, and she was like -- she tried to play it off

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

34

1     that she didn't understand that the customers that were  
2     on the 90 list were within their three days, and I very  
3     kindly was like, um, actually, you did know because we  
4     always -- we referred to cancellations as cancellations  
5     that were within the three days, and we referred to  
6     refusals as customers that wanted to cancel outside of  
7     their three days. And I said anytime that I ever spoke  
8     to you or Craig or anyone in the company about the  
9     cancellation list, I referred to it as the cancellation  
10    list. Because we had a cancellation list and we had a  
11    refusal list. So there were policies and procedures in  
12    place for both of those lists of customers on how we  
13    processed reaching out to them, what the process was  
14    for cancellation versus the process for contacting  
15    customers that were technically a refusal, because  
16    outside of the three days, they didn't allow them to  
17    cancel their loan.

18                 So she was like, oh, well, I don't da, da,  
19    da, da. I don't know. But I told Sam -- which is the  
20    lead in the finance department. She said, "I told her  
21    to cancel all of the ones that are on that list moving  
22    forward." I was like, well, glad that you finally  
23    decided to do that. And she said I told her to do  
24    however many it was a week to get --

25                                 (Technical disruption.)

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

35

1 BY MS. DANIELS-HILL:

2 Q. For the record, I had to switch the

3 host. So I had asked Ms. Dorismar to take one pause  
4 from her testimony. It took me less than a minute  
5 or so to switch the host and resume the recording.  
6 Go on, Ms. Dorismar.

7 A. They did say that she -- Sarah Kirkland  
8 had requested for Sam -- Samantha Blaine to have one  
9 of the admins in the finance department to cancel --  
10 I don't know the exact number, but she said to make  
11 sure all of the cancellations that were legally  
12 within their three days to be canceled out within,  
13 like, two weeks because -- just to process them all.

14 So that is what I was told. I'm assuming  
15 that that happened, but, hopefully, moving forward,  
16 that if a customer cancels within their three days,  
17 they're just canceling them out. I don't know if  
18 that's -- I don't know if they just did that to clear  
19 up the big issue with the 90-plus or they were doing it  
20 to save face because Shawna quit and she blasted them  
21 for a lot of the things that she found out about or  
22 knew about to all of their sales reps, and they just  
23 wanted to save face so they did that. I'm not sure.  
24 But I am glad for the customers that were on that list  
25 that their stuff is finally finished and canceled.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

36

1                   MR. KEEN: A quick question, Alicia,  
2 if that's okay.

3                   You said Craig was a bigger owner and  
4 that's sort of why he called the shots. Am I  
5 understanding that correctly?

6                   THE WITNESS: From my knowledge, I do  
7 believe that him and his partner Michael -- I'm  
8 assuming because it's the two of them -- there's three  
9 owners. It's Michael, Craig, and Sarah. I'm assuming  
10 because Michael and Craig are married that they have a  
11 bigger stake in the business. So that would mean that  
12 he could call the shots more so than Sarah. I'm not  
13 saying that in every case he does, but I do believe  
14 that since they have two parts of ownership versus her  
15 one, that he has that more authority to do so.

16                  MR. KEEN: What was Craig's official  
17 position or did he have one?

18                  THE WITNESS: Owner. He tried to keep  
19 very behind the scenes. He worked more on the sales  
20 side of things and Sarah handled more of the operation  
21 side of things, but as it just fell finances was  
22 something that he looked at closely as well so he  
23 was -- he had a lot of pull in the policies and  
24 procedures with the finance department, as well as  
25 Sarah.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

37

1 MR. KEEN: But it was Craig who was  
2 saying, hey, I don't care if these people canceled

3 during their three days, if they haven't -- if the sale  
4 hasn't tried to be saved, we're not going to actually  
5 cancel them out?

6 THE WITNESS: He wanted to follow --  
7 so the process was to try to reach out, and I don't  
8 know if he just didn't believe if Shawna was reaching  
9 out, but he didn't want to cancel out the loan until we  
10 tried to save it. And because of how busy she was, she  
11 wasn't able to save it in a timely manner for -- so it  
12 extended way past the time that we should have canceled  
13 those loans out. Sometimes months.

14 MR. KEEN: A quick question about the  
15 clawbacks, was there ever a time when Mosaic or  
16 Sunlight or any other finance company did a clawback  
17 and there wasn't enough money in the Solar Titan  
18 account to cover the clawback?

19 THE WITNESS: I have no idea. I never  
20 had access to the banks.

21 Just letting you know that my children  
22 and my husband are in the car, but they're going to be  
23 very quiet.

24 BY MS. DANIELS-HILL:

25 Q. So you had said that they had been

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

38

1 essentially concerned about the money being pulled  
2 out of the account for cash flow reasons. And as  
3 you articulated quite well, that you didn't consider  
4 that to be money that they could spend anyway.

5 A. Right.

6 Q. Do you know whether that money was being  
7 spent somehow for Solar Titan even though it  
8 probably should have been held?

9 A. So, again, I wasn't on the accounting  
10 team. I wasn't given access to the bank. So I know  
11 that there -- you know, the cash in and the cash  
12 out, cash flow-type things, making payroll, paying  
13 for supplies and different things like that, buying  
14 vehicles for the company -- so I couldn't say how  
15 they split up the money.

16 Like, if it came in and it got past a  
17 certain milestone if they moved it to a different  
18 account, I'm not sure. That's how I would do it  
19 because if the money comes in and they're still legally  
20 within their three days, I'm not going to touch that  
21 money -- me. But, again, I don't know how the  
22 accounting was, and I don't know -- you know, obviously  
23 Sarah and Craig were owners. They had access to it. I  
24 don't know how their pay was set up as if they were  
25 getting paid each month or if they just had a

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

39

1 free-for-all to the business accounts. That, I don't  
2 know, and I don't want to speculate.

3 But I do know that they were -- because  
4 they constantly said cash flow, that they were using  
5 that money -- any money that was in the account, they  
6 were using the money to further the business. But  
7 then -- because you wouldn't get upset that we  
8 processed X amount of cancellations, and it ended up  
9 being a million dollars worth if you weren't using that  
10 money. Because if you weren't using the money when it  
11 came out, it wouldn't hurt. You know, you wouldn't  
12 feel it.

13 So the fact that he got as upset as he did  
14 at the fact that a million dollars in cancellations  
15 came out, then that made me assume that they were using  
16 the money to, you know, do the different things that  
17 comes with running the business.

18 Q. You said you did ultimately get access  
19 to the accounts?

20 A. No. I got access to the dashboard on  
21 the portals from Mosaic and Sunlight to see -- it  
22 will say deposit made, this much money; and then  
23 clawbacks, this much money. So I didn't have --  
24 ever have access to the accounts. I just saw in the  
25 portal what was given or taken from those finance

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

40

1 companies.

2 Q. Thank you. That makes a lot more sense.

3 So generally then when you were looking  
4 into those accounts -- or not into the accounts. I'm  
5 sorry -- into the portal, was there a portion in the  
6 portal that was attached to those bank accounts?

7 A. Say that -- say the message again. I'm  
8 sorry.

9 Q. The way I'm envisioning the portal is  
10 that it would probably have a page that talks about  
11 their transactions into and out of that bank  
12 account. What information about the bank account  
13 then would be in that portal? Like an account  
14 number? How is it showing up as a clawback?

15 A. No. So all it showed me was -- I mean,  
16 it could have been different because of the level  
17 that I had access to, but all I saw was say, for  
18 example, today's date, amount in, and then I could  
19 click on it and it would show me from what customers  
20 and, like, what types of payments they were. So  
21 whether it was milestone one payment, milestone two  
22 payment, or milestone three payment. That's all I  
23 could see.

24 And then, like, if there was ever a  
25 clawback, it would say today's date and then -- okay.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

41

1 So say, for example, today there was a deposit and a  
2 clawback, it would show all the deposits that were  
3 coming in and then it would show all the clawbacks.

4 So if, for example, there was a \$5,000  
5 deposit today, but there was an adjustment of 3,000, so  
6 in turn we were only getting \$2,000 because there was  
7 \$3,000 in clawbacks, and so it split up what -- what  
8 the milestones were for the deposits. So if it was  
9 milestone one, two, or three. And then for the  
10 adjustments or clawbacks, it would say clawback  
11 cancellation or clawback milestone three because we  
12 hadn't reached that claw -- that level yet. So they  
13 were pulling a hundred percent of those funds back or  
14 the 60 percent from the cancellation.

15 So that's all I saw. It didn't show me  
16 anything -- it didn't show me what account it was going  
17 into. It didn't show me the balance of anything other  
18 than this was what was happening that day and why.

19 Q. Okay. And then you mentioned Solar  
20 Titan purchasing vehicles for the company?

21 A. Yes.

22 Q. How many vehicles?

23 A. So for the crews, we had different  
24 trucks that we used. And obviously as we grew, I --  
25 I think it was 10 or more crews by the time I left.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

42

1 And then obviously -- we also had service techs.

2 So we had our crews that needed trucks and  
3 trailers, and then they were -- we were in four  
4 different states when I left. It was Georgia,  
5 Florida -- no -- sorry -- Georgia, Alabama, Tennessee,  
6 and Kentucky. And they were talking about expanding  
7 into Florida before I left, but it hadn't happened  
8 before I left the company.

9 So we had all the different vehicles, and  
10 there were different -- they opened up a warehouse in  
11 Kentucky. We had our main warehouse in New York --  
12 sorry -- Knoxville. Not New York. Knoxville. And  
13 then they opened one in Georgia, but I believe I heard  
14 they closed it down because -- I don't know if there  
15 was just too many issues down there with the staff that  
16 they had hired, but I don't know if it's still there or  
17 not.

18 But -- and then they bought smaller  
19 vehicles like different cars. I can't remember the  
20 brand, but they bought cars for the service techs  
21 because they didn't need as big -- they didn't need a  
22 truck or trailer. So they just bought smaller cars so  
23 where they could go to the different client's houses if  
24 there was issues with the system to go out and fix  
25 those.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

43

1 Q. I have 21 seconds before I'm kicked out,  
2 just to let everyone on the call know, so I'm

3 probably going to be kicked out. So I don't know if  
4 we want to take a break or --

5 A. That's fine.

6 Q. -- and then come back.

7 MR. KEEN: We can take a break. Do  
8 you need to drive home or are you going to be going  
9 anywhere?

10 THE WITNESS: We will be driving  
11 possibly back home, yes.

12 MR. KEEN: And whenever we do that, if  
13 we're not done, then we can just take a break while  
14 you-all drive home, and then, hopefully, you can join  
15 us back again.

16 THE WITNESS: So do you want to say a  
17 certain time? Maybe in 45 minutes or is that too long  
18 of a break?

19 MR. KEEN: I don't think that's too  
20 long of a break, if that's how long it's going to take  
21 you-all to get home. I just want to be accommodating  
22 to you.

23 THE WITNESS: Forty-five minutes would  
24 be wonderful.

25 MR. KEEN: All right. Then that is

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

44

1 what we'll do. I'm just going to stop my video and  
2 stop the recording, and then -- I'm not going to leave  
3 the meeting, but if you need to leave the meeting and  
4 rejoin, that's perfectly fine.

5 THE WITNESS: Okay.

6 MR. KEEN: I'm stopping the recording  
7 now.

8 (Pause in recording.)

9 BY MS. DANIELS-HILL:

10 Q. Before we took the break because of my  
11 tech issues, we were talking about some of the cars  
12 that Solar Titan has. I think you had mentioned  
13 that there were cars for the service techs.

14 A. Yes. So we -- they had bought trucks  
15 and trailers and cars for the crews and the service  
16 techs.

17 Q. You said you don't remember the make or  
18 the model?

19 A. Huh-uh. I believe they were Kia Souls  
20 for the service techs, but I don't want to go under  
21 oath saying that, but they were smaller cars just  
22 for two people.

23 Q. Were there any other vehicles that the  
24 company purchased for the company other than the --  
25 I think you said that they also had trucks for the

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

45

1 installer?

2 A. So I don't know if they were purchased

3 by the company or if they were purchased by Craig,  
4 but I do know that Shawna had a Tesla that the  
5 company gave her to use, and then Dale Roden, who  
6 was another manager, was given a Tesla as well. So  
7 I don't know if they were personally Craig's or if  
8 they were actually for the company, but when Shawna  
9 resigned, she obviously gave the Tesla back.

10 Q. So you don't think Shawna or Dale  
11 purchased their Tesla?

12 A. No.

13 Q. They were using it for their work?

14 A. Yes.

15 Q. And then was there any other property  
16 that Solar Titan purchased? You mentioned the  
17 building in Knoxville. Is there only one building  
18 in Knoxville?

19 A. No. There is the main headquarters  
20 which is where all the offices are in Knoxville and  
21 then the warehouse. And so I don't believe any of  
22 the outlying warehouses were purchased. I think  
23 they were just under a lease agreement.

24 Q. And the warehouse in Kentucky -- that  
25 was also under lease?

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

46

1       A.               That, I don't know. Like, I know that  
2       we were using the facility. Whether or not it was  
3       ours or theirs or if it was leased, I don't know  
4       that.

5       Q.               Do you remember the address for the  
6       Kentucky warehouse?

7       A.               I was never told that information, no.

8       Q.               Did you maybe overhear or were you ever  
9       told the city that it might be in?

10      A.               Possibly Lexington.

11      Q.               And the warehouse in Tennessee, where  
12      was that located?

13      A.               That was I think it's -- I know it's on  
14      Yellow Pine Drive. The number -- address -- I  
15      couldn't remember, but it is in -- on Yellow Pine  
16      Drive in Knoxville.

17      Q.               Was that close to where the offices are?

18      A.               Yeah. Probably about a 10- or 15-minute  
19      drive.

20      Q.               Was there any other property that Solar  
21      Titan purchased or that may have been purchased by  
22      Solar Titan or Craig?

23      A.               Not -- for the business, not that I know  
24      of. I know they were looking possibly into buying  
25      land to build, but I think when they found the

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

47

1 larger office space, that might have been tabled for  
2 a while.

3 Because they were originally -- when I  
4 first started, there was three different buildings that  
5 we were in. We were in -- and it was all on the same  
6 street. So the operations and warehouse was in the one  
7 building, and then sales and marketing were across the  
8 street in another. And -- and then as we grew, they  
9 opened a third building for HR and accounting, and then  
10 we grew again and moved us to where the warehouse is  
11 now on Yellow Pine. And then they turned the  
12 operations building into the sales offices.

13 And so it was -- before we all moved  
14 together, there was the Yellow Pine which was  
15 operations and the warehouse, and then there was a  
16 building on Lovell -- the buildings on Lovell Road were  
17 for the call center. One was for the call center. One  
18 was for HR, and then one was -- one was for HR and  
19 recruiting and then the other one was for accounting.  
20 So there were five total.

21 And then when they found the one on North  
22 Peters, they combined all of the offices together into  
23 the one building on North Peters except for the  
24 warehouse. They continued to have the warehouse there,  
25 but all of the different departments were under one

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

48

1 roof.

2 Q. And it was mentioned there might be a  
3 plane that was used for the business. Do you know  
4 anything about that?

5 A. Nope. I mean, I heard talk of it, but  
6 there's rumors, so I don't know if it was true.

7 Q. To your knowledge, there was no, like,  
8 outings for the company using a plane, anything like  
9 that?

10 A. Other than just rumor, no. But, like,  
11 confirmed that I knew that they took a trip, but  
12 there was rumors that there was a private plane that  
13 they would take vacations on when they would go to  
14 their home in Florida, but, again, that was just  
15 office gossip.

16 Q. And then I wanted to follow back up on  
17 some of the other things that you described with  
18 respect to the cancellations.

19 A. Uh-huh.

20 Q. So you mentioned that they have a  
21 different process for refusals than cancellations.

22 A. Uh-huh.

23 Q. What was the process not internally for  
24 cancellations, because you described that, but how  
25 would a consumer be required to cancel their

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

49

1 contract in the three days typically?

2 A. So they required a written notice. So

3 whether it was through email or a letter that was  
4 sent that had to be postmarked within the three  
5 days. So a customer couldn't just call in and say I  
6 want to cancel my contract. We would inform them  
7 that they are within their three-day period, could  
8 you please send an email to this address -- this  
9 email address or letter via mail, and it was also  
10 stated on the back of the contract as well.

11 So they had it in written -- that it needed  
12 to be in written format to cancel, and all of the  
13 information was on the back of the contract. And then  
14 if they called in, we shared that information as well.

15 Q. When a customer was told on the back of  
16 their contracts how to cancel, were they only given  
17 one option -- like one email address option to  
18 check?

19 A. Yes.

20 Q. And then who had access to that email  
21 account usually?

22 A. I had access to it, and then Sam --  
23 Samantha Blaine -- she had access to it. And then I  
24 do believe Sarah and Craig also had access to it.  
25 So it was a general -- it was -- I believe it was

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

50

1     like info@SolarTitan.com.

2     Q.             And there's not another email  
3     info@IdealHorizon or anything like that?

4     A.             Huh-uh.   (Witness moves head from side  
5     to side.)

6     Q.             Who actually was checking that account  
7     regularly to pull the cancellation notices?

8     A.             Samantha and -- Samantha was and then  
9     one of the other admins in the team.

10    Q.             Who was the other admin that was also  
11    checking?

12    A.             Her name was Kimberly Shell.

13    Q.             So then how would you know about the  
14    cancellations?   Like -- I know she was pulling the  
15    emails.   How did that information get to you for you  
16    to try to process the cancellation?

17    A.             Yeah.   So once I had been promoted, I  
18    wasn't the one -- I wasn't the person that was  
19    handling the cancellations.   So I had trained  
20    Samantha and Kimberly.   So the process was to --  
21    well, it kind of evolved over time.   So the first  
22    process when we received a call and then informed  
23    them we needed an email and we received that email,  
24    there was a shared spreadsheet that was between us  
25    and the sales department that they had access to.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

51

1                   So we would add their name, date of  
2                   purchase, amount of purchase, and reason for canceling  
3                   on the spreadsheet. They would create the cancellation  
4                   form that had all of that information and give it to  
5                   the sales manager. And so they were coordinating the  
6                   schedules between when she could call them and reach  
7                   out to them and updating us when that was complete.  
8                   Then they would send us the cancellation form to  
9                   either -- that it was a save or that it was cancel -- a  
10                  true cancel.

11                  And then one of the assistants for the  
12                  sales side had left the company, and because there was  
13                  a lot of delay in when we informed them and to when we  
14                  got it back, I decided that we needed to revamp that  
15                  process to where we notified -- like, we created the  
16                  cancel documents and we notified the sales team instead  
17                  of having that middleman -- the assistant do it or the  
18                  admin in the sales department do it, just because by  
19                  the time it got to them and to the manager and back to  
20                  them and back to us, it was very delayed.

21                  So I just thought it would be easier to cut  
22                  out that middle person and go directly to the people  
23                  reaching out to the customers. So towards the end  
24                  there was a gentleman named Sam VanHooser that -- he  
25                  was promoted to -- I don't know if it was regional

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

52

1 manager. I don't know. There were so many different  
2 positions and promotions and stuff on the sales side, I  
3 can't keep up with it.

4 So he was finally given authority to help  
5 with the cancellations because -- I don't know if it  
6 was because of me saying the amount is ridiculous.  
7 Like she either needs to be given specific days a week  
8 to be able to reach these people and, like, that's all  
9 she's able to do. Like, you guys have stretched her  
10 way too thin, so we need to have a better process  
11 because in the long run it's hurting the business  
12 because we're having to pay all these fees and interest  
13 charges.

14 So they gave him the authority to do that,  
15 and so I had a meeting with Sarah K. and that's when I  
16 told her it's going to take us 10 months to get all of  
17 these completed if we're just doing four a week,  
18 whether or not they had been approved by Craig. We  
19 have to do something better.

20 So -- and I was like but 90 of them haven't  
21 even been reached out to. So that is a bigger issue --  
22 that just creates more problems that we're not even  
23 trying to reach out and they've been on our list at  
24 that time since last year, and we haven't even reached  
25 out to them yet. And so she wanted me to have a

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

53

1 meeting with Shawna and John Carroll and Sam VanHooser  
2 to kind of go over a better process. So I shared with  
3 them that we were 90 deep and that we needed to get  
4 these called to where we could get them approved by  
5 Craig, because that's just slowing down the process.

6 So we had the meeting. I shared with them  
7 that it's so important, and I even shared with them my  
8 opinion on we shouldn't even be updating -- we  
9 shouldn't be uploading documents into the finance  
10 portal until after the third day. They agreed, but,  
11 again, none of us had the authority to make that  
12 decision. I said but with what we're able to do and  
13 the process that we're given, this process needs to be  
14 better because we don't need to ever get 90 behind, no  
15 matter how -- I mean, I get it everybody is busy, but  
16 if this is the process and these are our customers --  
17 well, they're not customers -- to be ethical, like, we  
18 need to have a better process.

19 So whether it be, Shawna, you have to have  
20 two days a week that is strictly for this or you need  
21 to give it to someone else to do -- like, this is  
22 unacceptable that we've allowed this to get this large.

23 So they said that they were going to split  
24 it up. Shawna would take 30, John would take 30, and  
25 then Sam would take 30 of the people on the list and

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

54

1 hit them -- like, call each person at least twice if  
2 they can't get ahold of them, or if they speak to them,  
3 to try to save the deal.

4 My opinion was the ones that were from  
5 2021, like, I would be furious if I thought in December  
6 I canceled something and it's now May and you're just  
7 now trying to reach out to me to save it. Like, don't  
8 even call that person. Right? Because they are under  
9 the impression that they've already canceled, so why  
10 are you reaching out? But we had to do what we had to  
11 do because that's the process they told us we had to  
12 follow.

13 So they reached out to them. I asked  
14 them -- I said if you-all could be amazing and  
15 wonderful -- I think it was a Wednesday that we had  
16 that meeting. I said if you can hit these and get them  
17 to me by Friday, that we can -- it can't be ammo for  
18 Craig any longer that it's your fault that these aren't  
19 done, because right now he can say, well, Shawna hasn't  
20 even reached out to them for me to approve them.  
21 Right? So he had some on his list that she's reached  
22 out to to approve, and she had 90 on her list that  
23 wasn't even touched yet. So I was like if you can get  
24 these called and give them back to me, it's all in his  
25 court now and he can't say it's Shawna's fault. He

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

55

1 can't say it's sales' fault. It's his fault because he  
2 made the policy that he has to approve even though

3 she's already tried to save and even though they're  
4 already outside their three days. And they were like  
5 of course, absolutely, and they did get them all back  
6 to me by Friday and I believe some on Monday.

7 So they were all in his court. All of them  
8 were processed, and Sam VanHooser when he brought --  
9 was brought onto that role, we -- moving forward from  
10 all of those 90 being completed and on Craig's side --  
11 moving forward all of the new cancellations that came  
12 in were given day of to Sam and were expected to be  
13 given back to us the next day or that day if possible  
14 so it wouldn't ever build up again. So that was not  
15 his only job, but that was a very important part.

16 So if we only had two or three -- that's  
17 what I explained to them. If we only had two or three  
18 cancels a day and you handle those and it's fresher and  
19 it might be -- they might have had cold feet or they  
20 might have had whatever reason and you can just call  
21 them and share with them why did you want it in the  
22 first place? Right? And whatever cold feet that they  
23 might have they might change their mind or, you know,  
24 whatever. Or they just might be, you know what,  
25 financially it's just not a good time for us right now,

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

56

1 and we let them out of the contract. Right?

2 So it's a lot easier to save a deal that is  
3 just a few days old versus a few months old. So -- and  
4 they all agreed and for a while up until Sam quit  
5 because he quit shortly after that because he -- I  
6 don't know -- I believe he said work and home life  
7 balance since he had the promotion was just too much,  
8 and he resigned. And then it just started building up  
9 again.

10 But because we were so -- we had such a  
11 long list, and at the time Sarah was only saying four a  
12 week, she did -- after -- once I got them all  
13 completed, she said, "Don't wait until Craig approves  
14 them. Do the oldest first, like 8 to 10 a week." And  
15 I was like, "Okay, we'll do that." I was like it's  
16 going to take us -- it was going to take us 10 months  
17 before. It's going to take us five months now, but --

18 And we had several conversations because  
19 Mosaic was really weird how they handled their  
20 clawbacks. They were very strict a lot of the times  
21 when it came to the 120 days to get to the final  
22 milestone, but it was strange because sometimes it was  
23 like the day of 120 they would claw back that money,  
24 and then sometimes they wouldn't even claw back that  
25 money until a month after the date. So, like,

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

57

1 sometimes we would go and nothing would happen, and  
2 other times it would be like \$4,000 -- \$4 million would  
3 come out of the account, and it's just like there  
4 wasn't any rhyme or reason.

5 And the same things with the cancellation  
6 processes. They had -- once they had released the  
7 money to us, they had a longer process to verify all  
8 the things to take that money back from -- from the  
9 first milestone for cancellations. So where we would  
10 process and share with them that this customer or these  
11 three customers were wanting to cancel, we notified  
12 them on this date, but then it would be months before  
13 they would ever process it. And -- I wouldn't say  
14 process it -- before it finalized their process to  
15 where it actually came out of our account.

16 So I had several conversations with Sarah  
17 Kirkland that I don't understand why he's wanting us to  
18 spread it all out like one a day or two a day or two a  
19 week or whatever it might be when sometimes it seems  
20 like Mosaic just holds 30 cancellations and then just  
21 takes them out all at once when it could have been from  
22 three months before that they're finally processing it  
23 and taking the money out.

24 So I'm like if there's no rhyme or reason  
25 as to why or why they take the money back from those

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

58

1 milestones, then us believing that spreading them out  
2 over time is going to have anything to -- you know, any  
3 assistance for us or their money flow or cash flow  
4 argument. Right? She said -- she agreed with me and  
5 she understood, but she obviously had to go with what  
6 Craig was saying.

7                   So that's what we did, but, as I shared  
8 with you, I was told after I left that they processed  
9 all of the 90 cancels within like a month. So there  
10 shouldn't be a backlog any longer, which I'm very  
11 grateful for the customers' sake.

12 Q.               Who told you that?

13 A.               Who told me what?

14 Q.               When you left, who told you that they  
15 had caught all those up and canceled them?

16 A.               Sarah Kirkland actually called me  
17 because -- well, Sam told me at first because her  
18 and I are still friends. She told me that Sarah had  
19 come to her and was claiming that she didn't realize  
20 that those were true cancels within the three days.  
21 And we both knew that that wasn't true, but she was  
22 excited at the fact that finally -- I don't know if  
23 they were listening to me or as I mentioned before  
24 Shawna blasted them in her resignation letter and  
25 shared it with all of the sales associates to -- and

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

59

1 that was mentioned in the letter, that they had held  
2 so many cancellations due to cash flow.

3 So I don't know if it was because they were  
4 exposed that they, like, we need to do something to  
5 show that she was lying or show that we're not shady or  
6 I don't know why they decided to do it finally. And I  
7 also don't know why that she made it a point to act  
8 like she wasn't aware of the type of cancel it was.

9 So I don't know why she reached out to me.  
10 Maybe it was because she wanted validation of her  
11 thinking that she didn't know that it was that, but I,  
12 like I mentioned before, kindly reminded her, yes, we  
13 had several conversations about what type of  
14 cancellations those were and you were in agreement with  
15 me, but because Craig didn't want to cancel them out,  
16 your hands were tied.

17 So -- and she kept saying that she always  
18 thought they were refusals and she always thought that  
19 that's what those were. And I was like, no, because we  
20 always -- we always name refusals -- any communication  
21 about cancels or refusals, we always specify these are  
22 refusals. Because I would always tell her these are  
23 the cancellations, and we still have at least 20  
24 refusals that haven't been reached out to. So I, like,  
25 very nicely reminded her, yes, you knew the difference

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

60

1 and you knew that they were within their three days.

2 And it was kind of like, well -- well, we  
3 fixed it and we're canceling it out and they should all  
4 be canceled within this month. And I was like praise  
5 the Lord. I'm glad that he finally agreed to do that.  
6 And, honestly, I don't know if he agreed to do that.  
7 It might have been something that she finally said this  
8 is enough and we have to get this burden away and do  
9 the right thing. So, hopefully, that's what it was.

10 Q. When you say he may not have agreed to  
11 do that, you're talking about Craig Kelley?

12 A. Craig Kelley.

13 Q. So I wanted to ask a little bit about  
14 the spreadsheet because it sounds like you were  
15 careful to separate cancellations from the refusals.  
16 Was there a different spreadsheet then for refusals?

17 A. There were -- so I believe the  
18 spreadsheet was labeled cancels and refusals and  
19 there were two tabs. So there was the cancellation  
20 tab and then there was the refusal tab and then  
21 there was a saved tab. So if any of them were  
22 saved, they were moved and put on there and we  
23 processed it and moved forward.

24 Q. And then you mentioned that those --  
25 after your meeting with Shawna, Sam, and John, they

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

61

1 were able to process I think you said 90. They  
2 split them up 30, 30, 30. And that then goes to

3 Craig to be approved after they did their save  
4 calls?

5 A. Since he had requested that he approve  
6 them, that would have been the process, but Sarah  
7 Kirkland had said to just cancel them out 10 a week,  
8 don't worry about giving them to Craig, just cancel  
9 them out. So that's what I did.

10 Q. But she still didn't say cancel them all  
11 out when she had them all on Friday. She still said  
12 10 a week?

13 A. Right, because she knew -- I'm assuming  
14 she knew that Craig would be livid if we canceled  
15 them all out. So she just felt like spread them out  
16 over time to where it wouldn't be as noticed if they  
17 all 90 were taken out of the account at once.

18 Because in her defense -- well, not her  
19 defense, but you've got to look at we weren't just  
20 looking at clawbacks from cancellations. We were  
21 looking at clawbacks from not getting the work  
22 finished, and that was an even bigger problem than the  
23 cancellations.

24 So it's like this money over here that's  
25 being taken out is actually Solar Titan money; we just

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

62

1 haven't completed the project. Where this money over  
2 here is being taken out all at the same time from money  
3 that isn't our money. So it's like they're getting hit  
4 by both sides, and it was for a minute there constant,  
5 and it might still even be constant. But that --  
6 that's a whole other topic and issue.

7 Q. And then the one thing that we haven't  
8 talked about in a whole lot of detail is the cash  
9 buyers. Did you do anything with the cash buyers?  
10 You knew they paid 50/50.

11 A. Yes. So at the time of sale they wrote  
12 a check for 50 percent of their purchase. And then  
13 it was deposited, and then once it was deposited,  
14 that was the milestone, if you want to state that,  
15 so we had to know that the check cleared before we  
16 moved it on to the admin department that worked with  
17 the utility companies. So once we had a clear from  
18 accounting, we would move the file to the next  
19 department.

20 They would work with the utility companies,  
21 do the connection documents and things like that, and  
22 send it on -- once they had the approval or  
23 notification from the utility company, they sent it on  
24 to permitting where they would pull the permit. And  
25 then once it was pulled, they would send it over to

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

63

1 scheduling and they would get it scheduled and  
2 installed.

3 And so the day of installation, the finance  
4 team would call the customer and ask -- well, we would  
5 put in the notes "pick up check from customer," and  
6 sometimes the crew guys would remember to request the  
7 check and they would bring it in. And then if they  
8 didn't, then we would have to reach out to the customer  
9 and ask them if they wanted to do a card payment over  
10 the phone or if they wanted to mail in a check. Then  
11 we had that list that we were chasing to get the final  
12 payments done.

13 Sometimes it was difficult because they  
14 were like, well, it's not on and it's not operating.  
15 Why am I giving you money? And we were told to tell  
16 them that their contract states that the final payment  
17 was due at installation, and a lot of times their  
18 thought of the meaning of the word was "installation  
19 and on and operating," but that wasn't Solar Titan's  
20 definition of the word "installation." It was  
21 "installation." And so -- and then like the final  
22 process would be the inspections and then commissioning  
23 afterwards.

24 So sometimes people would pay it.  
25 Sometimes they were adamant no, they wouldn't pay

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

64

1 anything at all until they were turned on, and then  
2 sometimes we could get 40 percent and then hold the  
3 last 10 for when they're turned on.

4 So we just tried to be as -- sorry -- I  
5 lost words. We just tried to help the customers any  
6 way that they could and also not upset Craig that the  
7 fact that we have X amount of money out for complete  
8 jobs in his mind.

9 Q. So Craig sometimes would know then when  
10 that money hadn't been paid yet by the customer?

11 A. Yes. So I do believe that the  
12 accounting department kept him updated on any  
13 outstanding balances. So he would come to us all  
14 the time and say we have this much money that we  
15 need to collect, and then -- so it even turned into,  
16 like, a bigger ordeal because there were a lot  
17 more -- they didn't like to do cash deals, but  
18 obviously they would just because like the whole  
19 fact of people don't want to pay until their product  
20 is on, you know.

21 So -- but, like, it came to the point where  
22 it was constant, like, have we called these customers,  
23 have we called them. It was, like, yes, we've called  
24 them. They're not wanting to pay, and we've noted it  
25 to where Sam would actually get a bonus for collecting

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

65

1 payments on the end for each payment she collected  
2 because it was -- I don't know if it was because they  
3 were having so many clawbacks and they were needing  
4 money from anywhere that they could get it. I don't  
5 know. But she was getting a bonus every time that she  
6 collected a payment, which, hey, good for her, you  
7 know. So ...

8 Q. Then you mentioned earlier that Mosaic  
9 was charging \$500 when a contract was canceled. Was  
10 it anytime it was canceled or --

11 A. No. If it was canceled outside of the  
12 three days.

13 Q. Okay. Is that the same with the  
14 interest that they were charging, they were only  
15 doing that when it was outside of the three days?

16 A. Uh-huh, yeah.

17 Q. What was the reason why they were  
18 charging that fee?

19 A. That was just their policy.

20 Q. Okay. And when they charged that fee,  
21 it was per installation that was canceled?

22 A. Per contract, yes.

23 Q. And how did you become aware -- oh,  
24 because you said you got access to the portal and  
25 that showed up in the portal?

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

66

1       A.               Yeah. So there was the time when we  
2       were -- earlier on when I was just creating policies  
3       and things like that that I was asking a lot of  
4       questions and getting better understanding of why  
5       we're doing the things that we're doing and getting  
6       a better understanding of how we could make it more  
7       sustainable going forward, that -- I was told that  
8       they -- and I think it was kind of also a tool that  
9       they could use with Shawna and the sales team to get  
10      them -- because it's been a problem since I started  
11      with the cancellations. Like, constantly.

12                    I think they used it as a tool to get maybe  
13      a fire under somebody to do that part of their job,  
14      because if they were aware that the company was being  
15      charged this much money if we canceled after the three  
16      days because we didn't get it canceled within the time  
17      frame that might influence them to be more on top of  
18      reaching out to try to save the calls. Honestly, I  
19      think that's why I was ever told that information.

20                    So -- and it wasn't until later when I  
21      actually had got access which was probably January of  
22      this year, February. So not very long when I was  
23      actually made aware that we were charged interest per  
24      month also on top of that fee, and that just blew me  
25      away that they had known this whole time that not only

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

67

1 are they getting charged that fee, but they're getting  
2 charged interest.

3 And then the question that the  
4 accounting -- someone from accounting actually came to  
5 me and asked me -- he said, Are we being charged the  
6 interest per month of when it was bought to when we  
7 were -- when we notified them that the cancellation  
8 happened or when they actually canceled it? And I was  
9 like, I don't -- that would be a question for Mosaic,  
10 you know.

11 And I actually brought that up to Sarah  
12 Kirkland because I was like they shouldn't be -- I  
13 asked her if she wanted me to reach out to Mosaic  
14 because if we're notifying them that the cancellation  
15 took place in March, but then they're not actually  
16 taking it out of our account and finishing their  
17 process until June, are we being charged from March to  
18 June or are we just being charged -- hold on -- sorry.  
19 I just got a text message about my dog. We're trying  
20 to get her groomed today. I apologize.

21 Q. No problem.

22 A. Okay. So, you know, because that's  
23 quite a bit of money too, if you think about it as  
24 well. So I was just always trying to find ways to  
25 better the company in the areas that I had, you

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

68

1 know, control over, if you want to say that, to  
2 make -- to make it better for the customer and also  
3 make it better for the company. Right?

4 Because I was working there. I wanted the  
5 company to succeed, but I also wanted the company to do  
6 the right thing for their customers. So anywhere that  
7 I could try to find things that one could be better for  
8 the customer and the company, I would also try to voice  
9 those. So I saw this as a concern for the company's  
10 well-being because we're just hemorrhaging money for --  
11 on customers that aren't actually customers.

12 And it's like -- as -- obviously, I wasn't  
13 the owner, but as an employee, it's like if we're just  
14 hemorrhaging money because you don't want to deal with  
15 the cash flow problems or whatever it might be, like,  
16 in the long run you're hurting yourself as owner and  
17 you're hurting the company more by spreading these out  
18 to four a week or none at all than versus just doing  
19 all 90 and getting it over with. Because those 90  
20 spread out over 10 months is making the company lose a  
21 lot of money.

22 So I brought that to her attention, and I  
23 said, you know, if we're notifying them at this time  
24 and they're not taking -- and they're charging us for  
25 three or four months later, that's not okay and we need

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

69

1 to reach out to them and make sure -- and really find  
2 out what their process and, like, how much money  
3 they're actually charging us.

4 And because they're kind of wishy-washy  
5 with the clawbacks on the other side, that even though  
6 we are past the 120 days, they don't always claw it  
7 back on that 120 days. Sometimes they give us a little  
8 grace and sometimes they don't and this, that, and the  
9 other. She didn't want me to call and make a point to  
10 be like, hey, that's not okay if we notified you in  
11 March and you're still charging us interest all the way  
12 until June or July when they can take that and say,  
13 okay, well, we're going to stop giving you grace on the  
14 other clawback.

15 So I was never allowed to get a clear  
16 information on regards to the interest charges because  
17 they didn't want them to be more strenuous on the back  
18 end too where that is the bigger issue than the  
19 cancellation issue, if that makes sense.

20 Q. It does. It sounds like there was quite  
21 an interesting relationship with the finance  
22 companies, particularly Mosaic. When you started  
23 had they already had merchant finance agreements  
24 with Mosaic and Sunlight?

25 A. Uh-huh, yeah.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

70

1 Q. Had you seen those applications --

2 A. Nope.

3 Q. Okay.

4 A. Everything was really secretive and  
5 separated within the company. Like we -- they hired  
6 a -- so as someone that is -- that was hired in in  
7 the operations side of things and then growing that  
8 department, making policies and procedures for the  
9 finance department. Right? And then as we were  
10 growing, I was making policies and procedures for  
11 finance and for scheduling because that's what I was  
12 working on. Like, it was a brand-new baby company.  
13 Like, they might have been in business a year before  
14 I started, but they weren't -- they didn't have the  
15 momentum that they had when -- before from when I  
16 was there.

17 So -- like, they had no SOPs, none of that,  
18 quality assurance, any of that stuff set up. That's  
19 something that I love to do. So I was like of course.  
20 I started with the departments that I was working in,  
21 so finance and scheduling. And so when we had people  
22 call in because they were mad that the sales reps were  
23 telling them X, Y, and Z, like, we would go and try to  
24 get information about what they were being trained in  
25 their training classes. Because they would have two

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

71

1 weeks' worth of training classes for the new sales  
2 reps, and it was, like, we were never allowed to go  
3 into the sales classes ever.

4 And then, like, I would always suggest,  
5 well, could I go or another person go and just share to  
6 the new sales reps, like, what the process is actually  
7 like after they make the sale, because they have no  
8 idea. So, like, they are giving them -- the customers  
9 this expectation that physically cannot be done.  
10 Right? We were under the assumption that's what they  
11 were doing because all we were hearing is complaints  
12 from the customers that they said they were going to be  
13 on and operating in two weeks.

14 And I'm like there's no physical possible  
15 way that someone can purchase a system, get -- like,  
16 get all the materials bought, get all of the  
17 interconnection documents approved by the utility  
18 company. If they had an HOA, that's an even longer  
19 process. Permits pulled, installation happened,  
20 inspectors come out. And even say it's a perfect world  
21 and they passed on the first time and then we send out  
22 a crew to commission the system -- right? -- there's no  
23 possible way that all of that could happen within two  
24 weeks. No possible way.

25 We can sometimes get your finance

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

72

1 approved -- your interconnection with your utilities  
2 and then if you don't have an HOA and get you installed  
3 in two weeks. That happened all the time, but when  
4 you're dealing with a utility company that has their  
5 own time frames that we can't control, you're dealing  
6 with HOAs that only have a board meeting once a month  
7 or once every six months, that's something that we  
8 can't control.

9 Then with -- with the inspector -- like the  
10 inspector -- so for the state of Tennessee, we put it  
11 in core and then they are supposed to get it out -- get  
12 the inspector out within 72 hours. That doesn't always  
13 happen and we have to resubmit it or resubmit it or  
14 call in and do different things like that. And that's  
15 one of the things that, like, as we were growing, we  
16 created this time line paper that we gave to the  
17 customers whether or not they read it, I don't know.  
18 But it was kind of like this is kind of the time frame  
19 in each one of these places.

20 And then after installation it was in big  
21 bold letters please be patient, a lot of these things  
22 are outside of our control. Right? Because we can't  
23 force an inspector to go out when we want them to. We  
24 notify them that when we're done, and then they have  
25 their schedule. And they have 75 other clients that

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

73

1 they have to go out and inspect. Right? So once they  
2 get out there and get that back, then, you know, we can  
3 move forward.

4 And then with most of -- I don't want to  
5 say most. A lot of the cases there were issues that  
6 came up that we failed for, and we had to send a crew  
7 out again and redo -- you know, fix the issues that  
8 were stated on the inspection report, and then we had  
9 to submit another request and then he had -- we had to  
10 wait for his schedule or her schedule again and then go  
11 back out.

12 So, I mean, I remember some cases where I  
13 don't know if it was that specific inspector that they  
14 would get to something and see something wrong and fail  
15 it and then we would get the report. We would fix what  
16 they said. They would go back out and they would see  
17 something else that wasn't even on the first one.

18 They didn't inspect the whole thing. They  
19 just inspected something that was wrong and they failed  
20 it, sent us the report, and we fixed it. This happened  
21 like six times to one client, and how frustrating that  
22 client must have been is understandably so. But that  
23 happens and that's -- that slows down the process.

24 Getting back to what I was meaning before  
25 was that everything seemed very secretive and separate.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

74

1 Like, we couldn't go in and share with the class. We  
2 couldn't even know what they were training in the  
3 classes. I mean, I don't know if they were told they  
4 couldn't come over to our side, but they never did.

5 So they actually hired a CEO around the  
6 time I was -- a little after I was promoted, and he  
7 really wanted to -- like he wanted to have a weekly  
8 meeting with all of the department heads. And I don't  
9 think Craig liked that very well because what he wanted  
10 us to do was -- I thought it was genius because you  
11 don't really -- like, you're in your department and  
12 that's what you focus on. You don't have the bigger  
13 picture.

14 So if you were in communication with the  
15 department before you and the department after you, you  
16 had a better understanding of what the customer is  
17 going through while they're in that department, while  
18 they're in yours and after yours. Right? To where if  
19 you have a call regarding a customer and they just left  
20 this department and they had some frustrations, because  
21 you're working closely with that department, you can  
22 assist that customer, explain things to that customer  
23 instead of sending it back to them, you know, and just  
24 having a better understanding of what they're being  
25 told from sales, because it came from sales straight to

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

75

1 finance. Right?

2 So for us to know exactly what they're

3 being told from the sales team would help any  
4 frustrations that they might have and then moving along  
5 down the line. Right? But that didn't last very long.  
6 And so I don't know. And he actually didn't last very  
7 long. He was fired rather quickly.

8 And I warned him very early on. I was like  
9 you're very passionate about what you're doing and you  
10 have opinions, but some opinions you just need to keep  
11 to yourself because you're not going to stay around if  
12 you're voicing your opinions because they don't like  
13 change and they don't -- I don't -- it just felt like  
14 you couldn't point out things that weren't okay to  
15 anyone, even though you're just trying to make their  
16 business better. You couldn't never point it out  
17 because you would just be on the bad list.

18 And that's kind of how I felt towards the  
19 end is because I was pointing out things that needed to  
20 change, and I don't know how many times I was told,  
21 "Sarah, stay in your lane." And it's like I'm going to  
22 stay in my lane but you-all keep dragging me out of my  
23 lane because these departments over here aren't doing a  
24 good job and you're wanting me to fix it because you  
25 saw that I'm capable of doing that, but then when

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

76

1   there's actual things that need to be changed to, one,  
2   make the company better and, two, make the process  
3   better for the customers, you-all smack me on the hand  
4   and tell me to stay in my lane.

5                   It's like how -- I just couldn't continue  
6   to work for the company when I knew that there were  
7   easy changes that could be made to, one, be beneficial  
8   for the customers and, two, for the company because you  
9   can't have a business if you have bad customers. So  
10   you need to make processes in place to make your  
11   customers happy, and then in the long run -- and I get  
12   why -- I understand his reasonings for spreading it  
13   out. Whether or not I agree with him, I get why he was  
14   wanting to do that because of the cash flow, but I also  
15   understood you're paying millions of dollars in fees  
16   you don't have to be paying just because you're having  
17   cash flow issues right now.

18                   So, bigger picture, you should just cancel  
19   them out on the third day and be done with it. And,  
20   even bigger picture, don't even put the documents into  
21   the finance companies until after the third day anyway,  
22   and then you wouldn't be having cash flow problems at  
23   all. So, anyway, sorry. That was my little rabbit  
24   hole, but it was just very frustrating to see how much  
25   money they were losing because of the process that they

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

77

1 wanted me to follow.

2 Q. You seem like you have a lot of

3 knowledge in creating these policies and stuff.

4 What was your finance background and history before  
5 you came to Solar Titan?

6 A. So I actually have a nonprofit  
7 organization. My husband is from Haiti and we had a  
8 ministry in Haiti. So the financial background that  
9 I have would just be that I was over fund-raising  
10 and accounting for donations that came in and the  
11 expenses for the ministry.

12 So that's pretty much it when it comes to  
13 financial experience, but just -- I don't know. That's  
14 just something that I've always been passionate about  
15 is organization and structure. So running a ministry  
16 in a Third World country takes a lot of organization  
17 and structure and planning. We had teams that came  
18 down several times through the year, and I coordinated  
19 sometimes their travel. I coordinated their stay while  
20 they were in-country, their lodging and meals and  
21 activities that they did.

22 So just having that background to be able  
23 to have the knowledge of how to structure and organize  
24 to make things run smoothly is a strength that I have  
25 that I brought to the table when I started at Solar

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

78

1 Titan.

2 So it just -- it was like this is what we  
3 do. Do you have ideas to make it better? And so I  
4 just -- I -- you know, obviously from the other two  
5 admins that were there when I first started, they  
6 didn't know anything about the financing and the  
7 processes there. So just sitting with Sarah and  
8 learning from her on what they did, and then just like  
9 moving forward like how can we make this better.

10 As we're like -- I believe the first --  
11 first few months -- so they started the company in  
12 2019, I believe in November. So November through the  
13 end of December there was probably 19 sales. When --  
14 when I left, there was over 40 a week in sales, if not  
15 more, give or take. Right?

16 So the first two months of business they  
17 had 19 sales in two months and then they were having  
18 over 40 a week when I left. So coming up with  
19 processes to go with the growth of the company is what  
20 I mostly focused on a lot in the beginning and even as  
21 I grew with the company and was promoted to the finance  
22 and admin manager. So their -- Ernie Bussell was the  
23 operations manager when I was -- we were hired in at  
24 the same time. I was hired in a week before.

25 So he was hired in and he was operations

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

## Sworn Statement of Sarah Dorismar - August 27, 2022

79

1 manager. So he was over the three admins that were  
2 handling operations. So Russell -- he handled, like,  
3 software stuff with updating the notes and making sure  
4 all the documents from the sales team and creating the  
5 folders for us to use in the office. And then Lakea  
6 handled all of the utility and permitting for the  
7 customers. And then I did finance. And then later on  
8 because Ernie was doing the scheduling, and as his job  
9 grew, he wasn't able to do the scheduling like he  
10 wanted to. So I was able to take that on.

11 And then it grew to where I was doing  
12 finance and scheduling, and then they split between  
13 Russell and Lakea -- they split Kentucky and Tennessee.  
14 So Lakea handled all the Tennessee files and Russell  
15 handled all of the Kentucky files.

16 So I created the folders, made sure the  
17 documents were there, handled the financing process,  
18 sent it on to them, and then when they were done it  
19 came back to me to schedule and then it went back to  
20 them and all the things.

21 So as we were growing, we grew into a  
22 bigger building. And Ernie was still there, and he was  
23 over -- he was over everything, but I had one other  
24 person with me in the finance. And, like, each  
25 department grew. So there was two people in Tennessee,

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

80

1 two people in Kentucky, two people in finance, and it  
2 just kept growing as we were moving into -- and then  
3 they hired Dale Roden who is the -- I don't know what  
4 his title is now but at the time it was the -- he was  
5 over the crews and, like, making sure that they knew --  
6 that they were trained properly and that they were  
7 following standards and different things like that.

8 And then there was Duane who is the  
9 warehouse manager, and then there was another Dewayne  
10 hired to be the manager over the scheduling department  
11 because as we grew we obviously had more crews and we  
12 needed more schedulers. And then that was a whole mess  
13 in itself.

14 So when Ernie was let go, they decided  
15 to -- instead of just have one operations manager, to  
16 have a team of managers. So that's when I was promoted  
17 to finance and admin manager. And then Dale was over  
18 the crews and installation. And Duane was over the  
19 warehouse and the other Dewayne was over scheduling.

20 So there wasn't any policies and procedures  
21 in place for admin. So I shadowed a lot with them for  
22 the first few weeks to get a better procedure because  
23 that was where all of the -- all of the customers would  
24 bottleneck in the process. So they wanted to have a  
25 better process set in place to where that wouldn't be a

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

81

1 bottle -- an issue anymore and we could move it faster  
2 through the system.

3 So I was able to create a process that sped  
4 up the system -- sped up each customer through each of  
5 those states. And then we added in Georgia as well.

6 And then as we were moving over into the  
7 new building, I was sharing with Sarah K. that there  
8 should be a split in those departments, to have a  
9 pre-installation admin team and then a post  
10 installation admin team. Because it was getting too  
11 overwhelming with the volume that we were having to  
12 handle -- have two people handle all of those clients  
13 to where a lot of times they were wanting to push,  
14 push, push, push, push to get it to install because  
15 that's when the money happens. Right?

16 So they were pushing really, really hard  
17 every single day. Like, I'm telling you, if it was  
18 9:00 and there wasn't something uploaded, I was either  
19 getting a phone call or Craig was in my office asking  
20 why this wasn't done yet from the sales the day before.  
21 Because it was you have to get this done. And it even  
22 got to the point where we hired someone to come in at  
23 7:00 in the morning to get it done before Craig came in  
24 the office, because he wanted the money from the sales  
25 the day before quickly -- faster than anything.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

82

1                   And the same thing was if it was cleared  
2   that first milestone and it was being held up in admin  
3   for the utilities or for this or whatever, that was  
4   always what can we do to get these done faster, what  
5   can we do to get these to installation, what can we do?  
6   It's like we don't have what we need yet because of X,  
7   Y, and Z. We can't push this faster. Like, we don't  
8   have approval from the utility companies. We don't  
9   have approval for this or we don't have approval for  
10   that.

11                  And they would get upset because they -- we  
12   weren't meeting our quota for the crew guys, which I  
13   get it. You're running a business. You have to be on  
14   quote for the things that you're needing. So I  
15   explained to them if we had a team designating this was  
16   their job, because they're trying -- right now they  
17   were balancing, okay, I've got to get these ready for  
18   installation, but I also have to get these inspected to  
19   get them turned on to get to the last milestone.

20                  So -- but because they weren't getting  
21   money at that last milestone anymore, it wasn't as  
22   important, I believe, in Craig's mind to really be  
23   emphasizing this area over here. And it was what can  
24   we do to get this better, to get it faster, to get it  
25   installed, because once we uploaded the picture that it

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

83

1 was being installed, he was happy because he got a  
2 hundred percent of the money at that time, because he  
3 got 60/40 or 70/30 or whatever it was, but he got a  
4 hundred percent of the money.

5 But -- and that's all they would focus on.  
6 And I said it -- and D2 -- we called him D2 because  
7 Dewayne Number 2, the second one. He would -- every  
8 meeting -- and they were getting very frustrated at  
9 him. I'm like I learned that if they don't want to  
10 hear it, just stop saying it, because they're not going  
11 to change. Right?

12 So fast-forward to a few months before I  
13 quit and they were having \$4 million taken out of their  
14 account, and then the next month \$2 million taken out  
15 of their account. At the time when they're like focus  
16 over here to get it to install, install, install,  
17 install. We have to have 40 a week. We have to have  
18 80 a week. We have to have this many a week. We're  
19 adding more crews. We're doing this to get to install  
20 faster, and they never looked at the back side.

21 Then he was furious and would come into my  
22 office furious at the fact that he had \$4 million taken  
23 out of the account, and I'm like I've been trying to  
24 tell you-all this for months. It's not just about  
25 getting to install. We have to get the crew -- the

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

1 team that's working on permitting and the team that's  
2 working on -- one, we've got to get the crews better to  
3 actually -- you-all are rushing installs to get them  
4 done faster to get the money faster that they're not  
5 doing them right.

6 Two, we don't have a good structure on the  
7 back end for inspections because Lourde (phonetic) can  
8 tell you how many they have over here that they haven't  
9 even touched yet because they don't have organization  
10 over there to even get the installs scheduled -- not  
11 the installs scheduled, the inspections scheduled. And  
12 then because the installs aren't being done right the  
13 first time there's like four or five failed inspections  
14 per project. So another thing is that's taking that  
15 time of that 120 days.

16 So you think 120 days -- is that three  
17 months? I think that's three months.

18 Q. Yes.

19 A. So you have -- you would think I just  
20 installed this. 120 days would not be difficult to  
21 get the inspector out there, get it inspected, and  
22 get it turned on, and notify the financing.

23 Q. It's actually four months.

24 A. Four months. Right. So you wouldn't  
25 think, wow, four months -- that shouldn't take a

Christina A. Meza, LCR, RPR, CCR 615.202.7303

## Sworn Statement of Sarah Dorismar - August 27, 2022

85

1 long time to do all those things. Right? But when  
2 the department that is over that doesn't have any  
3 structure, they don't have any leadership to make  
4 them do their job, and then the crews are going in  
5 so fast that they're missing things that every 90 or  
6 80 percent -- I don't know the numbers, but it was a  
7 lot -- are getting failed inspections to where the  
8 service team -- we -- I think we might have had two  
9 service guys at the very beginning. I think when I  
10 left, there was over -- there was two people per  
11 crew, and I think there were five or six crews for  
12 just service because we had so many service issues.

13 And it's like if we would do the job right  
14 the first time, we wouldn't have to be -- and, like,  
15 all these service techs, like -- it wasn't any revenue  
16 coming in for the service teams. Like, they weren't  
17 going out because they were cleaning panels or they  
18 were servicing this or doing this or that or whatever.  
19 It was fixing fails or issues with batteries or all the  
20 above. Right? There wasn't any revenue coming in for  
21 them going out. So, again, that's another place that  
22 the company is just hemorrhaging money.

23 So it's like big picture. Fix your  
24 processes. And that's what I said from the very  
25 beginning, if you have good processes when you're

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

86

1 small, as you grow, they'll be able to grow with you  
2 and sustain. Right? But they were wanting to grow so  
3 fast that they weren't willing to stop -- you couldn't  
4 ever say the word "stop" or "slow down" ever -- to make  
5 things better to where when we were going -- and  
6 forgive my language but we -- the managers were having  
7 a meeting one time, and we said we should not be going  
8 into Georgia because we have a backlog in Tennessee, a  
9 backlog in Kentucky. We do not need to be going into  
10 Georgia.

11 And one of them said we're just going to  
12 take this pile of crap and spread it around, because  
13 that's exactly what it felt like and someone else even  
14 said -- he said it's like you're driving -- you're in a  
15 NASCAR car and the engine isn't working, but they don't  
16 want you to turn the car off to fix it. They want you  
17 to fix it while you're going around the racetrack.  
18 That was his impression of Solar Titan.

19 They want you to fix the issues. They want  
20 you to make the thing better. They want it to be more  
21 efficient, but they don't want to slow down and they  
22 don't want to stop to actually allow you to get it  
23 where it needs to be or where it can be, which I  
24 thought was a very good analogy on his part.

25 It was just very frustrating when if anyone

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

87

1 had a brain could see that their inefficiencies in  
2 other departments that -- you couldn't not see them,

3 but then they were just being ignored, and I don't  
4 understand why they were being ignored other than the  
5 fact that they didn't affect the money quickly like my  
6 two departments did.

7           So they thought we've already got the  
8 money. It's not a big deal; we'll fix it in time.  
9 Well, it come to bite them in the butt when time caught  
10 up to them and they're getting \$4 million taken out of  
11 their account because they couldn't get to the finish  
12 line. They were so worried about install, install,  
13 install that they weren't worried about getting across  
14 the finish line.

15           That's why I made the comment earlier of if  
16 they can take a hundred percent of the money back  
17 because we didn't get to that third milestone, then  
18 that shouldn't be considered our money yet because we  
19 didn't finish the job. So we shouldn't be counting it  
20 as cash flow until we get to the end. So if they had  
21 the mindset of this isn't Solar Titan's money until we  
22 get to milestone three, they might have had a different  
23 outlook on making sure every process from finance to  
24 commissioning was flawless before expanding like  
25 they've expanded, you know.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

## Sworn Statement of Sarah Dorismar - August 27, 2022

88

1           So, like, where that person made the  
2   comment of when we were going into Georgia because we  
3   were behind in post install. So we always split it --  
4   and as we -- when we moved into the new building, I  
5   really felt like -- I don't know if the -- the whole  
6   thing of stay in your lane, Sarah; this isn't your  
7   department, Sarah; like, just stay over there was  
8   exacerbated when we moved in.

9           Because where I was placed in the  
10   department where before it was the four of you are  
11   operations managers and you're going to manage  
12   operations as a team. You each have a different  
13   department, but you're a team. And it split because,  
14   one, we moved away from the warehouse. So Duane -- oh  
15   Lord, I can't remember his last name. We called them  
16   D1 and D2 -- we left him at the warehouse so he  
17   couldn't really be part of the team anymore because he  
18   wasn't at the same location.

19           And then D2 was very frustrated with the  
20   scheduling because it was like every single week they  
21   were upping what he needed to do. So, like, this week  
22   it was 40. Next week it was 45 kilowatts. The next  
23   week it was 50 kilowatts. Like, every single week they  
24   were upping his minimum to get installed. And he was  
25   like you're not looking at the bigger picture.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

89

1                   He had the same mindset as me. He's like  
2                   you're not looking at the bigger picture because you're  
3                   wanting me to install 40 kilowatts or 80 kilowatts, but  
4                   then we can't turn on 80 kilowatts. So we're  
5                   installing all of these things, but then we're just  
6                   piling on and piling on and piling on more customers  
7                   that are getting frustrated because we don't have a  
8                   good process to get them inspected and commissioned or  
9                   serviced and commissioned because they failed their  
10                  inspection. Right?

11                  So he was like you've got to stop giving me  
12                  more of a minimum because we're not even getting the  
13                  ones that I did last week turned on. So he's like  
14                  you're just creating more problem for yourself in the  
15                  long run, and they would not listen to him at all, and  
16                  it was getting him very frustrated. And me and him  
17                  both were adamant every single meeting that we had was  
18                  I understand that you have cash flow and I understand  
19                  that you're adding on more crews, but -- and so when  
20                  you're adding on more crews, you're adding on more  
21                  payroll. Right? So you have to have more money coming  
22                  in. I get it.

23                  But it's like instead of adding on more  
24                  crews, like retrain the ones that we have to where they  
25                  are better to where -- and then, like, work on this

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

90

1 back side process, and they wouldn't listen. They  
2 wouldn't listen. They wouldn't listen until that first  
3 120 days showed up and there's \$4 million taken out of  
4 their account. That's when they noticed, and then they  
5 were all like why did we have this many not be able to  
6 get to the finish line?

7 I was like don't even. No. Because for  
8 months now not just myself but Dwayne Strickland had  
9 told you over and over and over again in meetings that  
10 you are putting too much emphasis on installs, way too  
11 much, and just completely ignoring the fact that  
12 there's another milestone that needs to be reached, and  
13 you never wanted to do anything about making this  
14 department better to where we could actually get --

15 If you're wanting me to do 80 a week, then  
16 we should be -- and when I say 80 -- kilowatts. That's  
17 how they measure before was kilowatts installed. So if  
18 this one is a 16 or this one is a 7, the minimum was  
19 this much kilowatts. And then towards the end  
20 Russell -- Russ, the CEO, actually changed it to  
21 jobs -- how many jobs per week. Because finance  
22 doesn't process their numbers -- they don't process  
23 kilowatts. This is how many sales that came in. We  
24 had this many sales. This is how many we processed.  
25 And the sale thing admin and permitting and all of

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

91

1 that.

2 But it was really weird because it was

3 always sales all the way to install, and then it was  
4 kilowatts for some reason. So he was like we should  
5 just have a more unified way to express what our goals  
6 are. So it went from this is how many kilowatts he  
7 needed to do, and this is how many jobs a week that he  
8 needed to do. Right? And then every department was  
9 supposed to process a minimum of so many jobs a week.

10 So finance was 40, and then I think I moved  
11 up to 50 a week before I left, but that was our minimum  
12 goal each week was to process 40 -- 40 sales and the  
13 same thing in admin. So finance moved it and I do  
14 believe they wanted either 40 to 60 jobs installed a  
15 week. And I said -- and that's kind of where it was in  
16 that conversation of flow. Well, if you want us -- if  
17 you want to be able to install 40 a week, then we need  
18 at least 60 sales come in because if you sold 60 but  
19 then 10 of them cancel or if you sold 40 and 10 of them  
20 cancel, how can I send you 40 to install? That can't  
21 be possible. Right?

22 Because -- so if I had 60 come in, 10  
23 canceled, then I had 50, and then through the process  
24 of utility companies like the utility company has three  
25 weeks of their processing time and then this one has an

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

92

1 HOA or they canceled outside of their three days.  
2 Right? We're not going to send them on to get  
3 scheduled even though they're refusing. Right? So  
4 they break off and lose some because of processing  
5 times.

6 So for me to send you 40 to install, I need  
7 at least 60 or 70 sold to me every week. So it's like  
8 you can't be requiring me to give you something that  
9 isn't being given to me. So that was a conversation  
10 that we had.

11 So -- and one of the things too that I  
12 think you need to be aware of is what is the legal  
13 definition of install complete? It was very gray.  
14 Sunlight requires a picture of the panels on the roof  
15 as well as the engineering plans when you notify them  
16 that the install is complete. That's Sunlight.

17 A long time ago Mosaic required a picture  
18 of the front of the house with the house number or the  
19 mailbox with the house number and the panels on a --  
20 like a collage of the pictures to send in to them.  
21 They just wanted one picture, so I had to make, like, a  
22 collage of pictures to upload to them. Then it started  
23 changing to they wanted the inverter and the panels and  
24 the front of the house into the picture.

25 So at that time we had full crews to where

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

93

1 the install happened and the -- there was -- the whole  
2 crew was there and they did the -- the electrical work  
3 on the ground and the panels on the roof and connected  
4 everything all in the same day or two days, depending  
5 on the size of the project. Right?

6 So Dale had the idea and convinced Sarah  
7 and Craig that splitting the crews and having a roof  
8 crew and an electrical crew would be more beneficial in  
9 the long run. Because what would happen -- say it  
10 rains or it snows or something, we couldn't send the  
11 whole crew out to the project. So that would delay the  
12 customer and could possibly make that crew not have a  
13 job for the day unless we could find something in an  
14 area that it wasn't snowing or raining. Right?

15 So if it was snowing, we could still send  
16 out the electrical crew but not the roof crew. Right?  
17 So there was a whole reason as to why. I never liked  
18 it because it just delayed the installation because the  
19 roof crew would go out and then sometimes three or four  
20 days later the electrical crew would go out. Right?

21 So -- and then it was done. But I was given  
22 instructions to notify the finance company that  
23 installation was complete at roof -- glass on roof.  
24 They always said glass on roof means complete. Glass  
25 on roof. Glass on roof.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

94

1           They said they verified with the utility --  
2 not the utility companies -- the finance companies and  
3 that it was -- and I even remember speaking with  
4 Mosaic. I can't remember exactly who. But I said is  
5 completed installed glass on roof? And I do remember  
6 them saying, yes, but I don't believe that that person  
7 understood what I was asking, because at the same time  
8 they were requiring us to put pictures of the inverter  
9 in the collage. So if they were considering glass on  
10 the roof as complete, they wouldn't be also requiring  
11 the inverter picture. Does that make sense?

12 Q.           So is it the electrical crew would be  
13 the one that would be doing the inverter?

14 A.           Uh-huh. So the panel crew -- the roof  
15 crew would be doing all the panels and brackets and  
16 things on the roof and then install the whip that  
17 went down to where the electrical crew came in, the  
18 two installed the inverter and the battery. They  
19 would connect the whip to the inverter and battery,  
20 and it would be technically complete.

21           So when they were talking -- when they had  
22 made the decision that this is what they're going to  
23 do, they're splitting into two crews, I voiced my  
24 opinion and I said, well, for the financial side of  
25 things we have to upload install completes. So are we

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

95

1 going to install when roof is done or are we going to  
2 upload when the electrical crew is done? And they told

3 me roof. And that's when I asked the question to the  
4 finance team at Mosaic and they said glass on roof  
5 is -- I think their terminology was substantial  
6 completion.

7               So I actually voiced my opinion and --  
8 because at the time we were still having to upload the  
9 pictures. Right? So I asked the question, and they  
10 said glass on roof is substantial completion. But the  
11 pictures were still stating -- like I had submitted  
12 some pictures that just had the front of the house and  
13 the panels, and they kicked it back and said we require  
14 a picture of the inverter. So I told Sarah K., if  
15 Craig is requiring us to put in at roof but Mosaic is  
16 requiring the inverter, I said I will not fabricate a  
17 picture that has an inverter that doesn't belong to  
18 that customer. I will not do it. Because I think  
19 that's what they were going to ask me to do.

20               And I told her -- and again not -- that was  
21 just my feeling because they were like we're doing it  
22 at roof. Well, how can we do it at roof when the  
23 inverter hasn't been installed yet and it's a picture.  
24 So I'm assuming you're going to want me to put a  
25 picture in there that has an inverter.

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

96

1                   So I had a conversation with her, and I  
2   said I respect you. You -- you know, like, I truly  
3   respect Sarah Kirkland. She is a wonderful woman. She  
4   does many great things for her employees. I said, but  
5   I will not work here -- I will not put in pictures that  
6   are false because my name -- because I have to sign in  
7   under my log-in. And I said my name is attached to the  
8   log-in and I'm the one putting in the picture, so I was  
9   like I'm not going to go to jail because I'm putting in  
10  fraudulent information into this portal.

11                  I said so I don't know if you-all need to  
12  have another conversation about when you're going to be  
13  considering completed, but they were adamant that it  
14  was going to be glass on the roof because, again, they  
15  get the money faster. They would be getting the money  
16  faster if they did it at glass on the roof. Right?

17                  So I told her think of not just I'm not  
18  going to do it, but think of it this way. If we have  
19  this crew scheduled to go out April 1st to put glass --  
20  to put the roof -- the glass on the roof -- the panels  
21  on the roof. Right? But then weather happens,  
22  something else like COVID happens and the crew gets  
23  sick and we have to postpone a week, and then the week  
24  that we get there that we have them scheduled it snows  
25  so we have to postpone them another week -- so that's

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**

**Sworn Statement of Sarah Dorismar - August 27, 2022**

97

1 just eating that 120 days. Right?

2 So we already have the issue of not getting

3 everything complete in that 120 days. And now you're  
4 telling me to submit to Mosaic that we have completed  
5 this install when we're only half done and that just  
6 eats our 120 days. So we're going to have more  
7 clawbacks because of X, Y, and Z slowing us down to get  
8 all the way completed, one, and then -- so not only  
9 before we were dealing with failed inspections, not  
10 getting the inspectors out there in time, not having  
11 that process to where it sits for three weeks before  
12 they can even pull it because they're so far behind  
13 anyway. Right? So now we're adding the possibility of  
14 a two-, three-, four-week delay in getting the  
15 electrical even installed. Right?

16 And the other problem was -- is Craig was  
17 adamant that we had more roof crews than we had  
18 electrical crews. So where electrical -- and that was  
19 another thing that frustrated Dewayne -- D2 was that  
20 he -- say for example he had six roof crews, he only  
21 had two electrical crews. So his roof crews were  
22 expected a minimum of 40 a week. So how can we do 40  
23 installs -- we can do 40 installs, but then the next  
24 week -- like that week we could only do 20 electricals.  
25 Right?

**Christina A. Meza, LCR, RPR, CCR 615.202.7303**